



Magino Gold Project

2021 ANNUAL REPORT TO THE IMPACT ASSESSMENT AGENCY OF CANADA (IAAC)

**REPORTING PERIOD JANUARY TO DECEMBER 2021, AS PER
ENVIRONMENTAL ASSESSMENT DECISION STATEMENT CONDITIONS
2.9 AND 2.10**

**INCLUDES SCHEDULE OF DECISION STATEMENT CONDITIONS (AS PER
DECISION STATEMENT CONDITION 9.1), AND SCHEDULE OF ALL
ACTIVITIES (AS PER DECISION STATEMENT CONDITION 9.2)**

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Submitted To:
Impact Assessment Agency
of Canada
55 York Street, 6th Floor
Toronto, ON
M5J 1R7 Canada
Reference Number: 80044

Submitted By:
Prodigy Gold Incorporated
First Canadian Place
100 King St. W., Suite 3400,
P.O. Box 130
Toronto, ON
M5X 1A4 Canada

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LIST OF ACRONYMS

Batchewana First Nation	BFN
Canadian Council of Ministers of the Environment	CCME
Class Environmental Assessment for Resource Stewardship and Facility Development Projects	Class EA-RSFD
Environment and Climate Change Canada	ECCC
Environmental Assessment	EA
Environmental Compliance Approval	ECA
Environmental Effects Monitoring	EEM
Fisheries and Oceans Canada	DFO
Fugitive Dust Best Management Practices Plan	FDBMPP
Garden River First Nation	GRFN
Health Canada	HC
Impact Assessment Agency of Canada	IAAC
Kilometres	km
<i>Metal and Diamond Mining Effluent Regulations</i>	MDMER
Métis Nation of Ontario	MNO
Michipicoten First Nation	MFN
Million tonnes	Mt
Missanabie Cree First Nation	MCFN
Natural Resources Canada	NRCan
Nitrogen dioxide	NO ₂
Ontario Ministry of Energy, Northern Development and Mines	ENDM
Ontario Ministry of the Environment, Conservation and Parks	MECP
Ontario Ministry of Natural Resources and Forestry	MNRF
Particulate matter	PM
Protection of Aquatic Life	PAL
Red Sky Métis Independent Nation	RSMIN
Sulphur dioxide	SO ₂
Total suspended particulates/particles	TSP

Total suspended solids	TSS
Transport Canada	TC

EXECUTIVE SUMMARY – ENGLISH

Prodigy Gold, Inc. (Prodigy), a subsidiary of Argonaut Gold, is in the process of developing the Magino Gold Project (the Project) located approximately 40 kilometres (km) northeast of Wawa, Ontario, in Finan Township, Algoma District. The site is accessed via Goudreau Road from the Township of Dubreuilville. The Project includes the construction, operation and closure of an open pit gold mine, with approximately 150 million tonnes (Mt) of ore and approximately 430 Mt of mine rock and associated infrastructure.

Federal environmental assessment (EA) approval was received via the Decision Statement issued on January 24, 2019. This Annual Report is submitted in compliance with condition 2.9 of the Decision Statement, and describes activities undertaken by Prodigy to comply with each of the conditions in the Decision Statement during the reporting period January to December 2021.

The parent company of Prodigy, Argonaut Gold, announced the start of construction on February 19, 2021. Notable aspects of the 2021 report include:

- Prodigy began field work under the Environmental Effects Monitoring (EEM) program in 2021 including water quality sampling, fish tissue sampling, and monitoring of nutrient levels, algae abundance, and dissolved oxygen levels.
- Prodigy commissioned the Lovell Lake Treatment Pond in 2021, which is being used to treat excess contact water under Ontario Ministry of Environment, Conservation and Parks (MECP) Environmental Compliance Approval (ECA) Number 5113-BWZKRY.
- Prodigy established the Lovell Lake Treatment Pond and Waterbody 3 Sediment Pond in 2021, which ensures the resulting treated water meets the Canadian Council of Ministers of the Environment (CCME) Protection of Aquatic Life (PAL) guideline for total suspended solids (TSS).

EXECUTIVE SUMMARY / SOMMAIRE – FRANÇAIS

Prodigy Gold, inc. (Prodigy), une filiale d'Argonaut Gold, élabore le projet Magino Gold (le Projet) situé à environ 40 kilomètres au nord-est de Wawa (Ontario), dans le comté de Finan du district d'Algoma. Il est possible d'accéder au site par la route Goudreau à partir du comté de Dubreuilville. Le Projet comprend la construction, l'exploitation et la fermeture d'une mine d'or à ciel ouvert, laquelle comprend environ 150 millions de tonnes (Mt) de minerai et environ 430 Mt de roches de mine et d'infrastructures connexes.

L'évaluation environnementale (EE) fédérale a été approuvée dans la déclaration de décision présentée le 24 janvier 2019. Le présent rapport annuel est présenté conformément à la condition 2.9 de la déclaration de décision. Il décrit les activités menées par Prodigy afin de respecter chacune des conditions énumérées dans la déclaration de décision pendant la période visée par le rapport, soit des mois de janvier à décembre 2021.

La société mère de Prodigy, Argonaut Gold, a annoncé le début des travaux de construction le 19 février 2021. Voici certains faits saillants indiqués dans le rapport de 2021 :

- Prodigy a entrepris les travaux sur le terrain dans le cadre du programme des études de suivi des effets sur l'environnement (ESEE) en 2021, y compris l'analyse de la qualité de l'eau, l'échantillonnage de tissus de poissons et la surveillance des niveaux de nutriments, de l'abondance d'algues et des niveaux d'oxygène dissous.
- Prodigy a commandé l'étang d'épuration de Lovell Lake en 2021; cet étang d'épuration est utilisé pour traiter les eaux usées excédentaires conformément à l'approbation environnementale du ministère de l'Environnement, de la Protection de la nature et des Parcs (MEPP) n° 5113-BWZKRY.
- Prodigy a mis en place l'étang d'épuration de Lovell Lake et le bassin de sédimentation Waterbody 3, qui a pour but d'assurer que l'eau traitée résiduelle est conforme à la ligne directrice sur la protection de la vie aquatique (PVA) relative au total des solides en suspension (TSS) du Conseil canadien des ministres de l'Environnement (CCME), en 2021.

1. INTRODUCTION

Prodigy Gold, Inc. (Prodigy), a subsidiary of Argonaut Gold, is developing the Magino Gold Project (the Project) located approximately 40 kilometres (km) northeast of Wawa, Ontario, in Finan Township, Algoma District. Figure 1 shows the location of the Project. The site is accessed via Goudreau Road from the Township of Dubreuilville. The Project includes the construction, operation and closure of an open pit gold mine, with approximately 150 million tonnes (Mt) of ore and approximately 430 Mt of mine rock and associated infrastructure. The open pit mine will be situated in the same location as a past-producing underground mine, and as such the Project is considered a brownfield site.

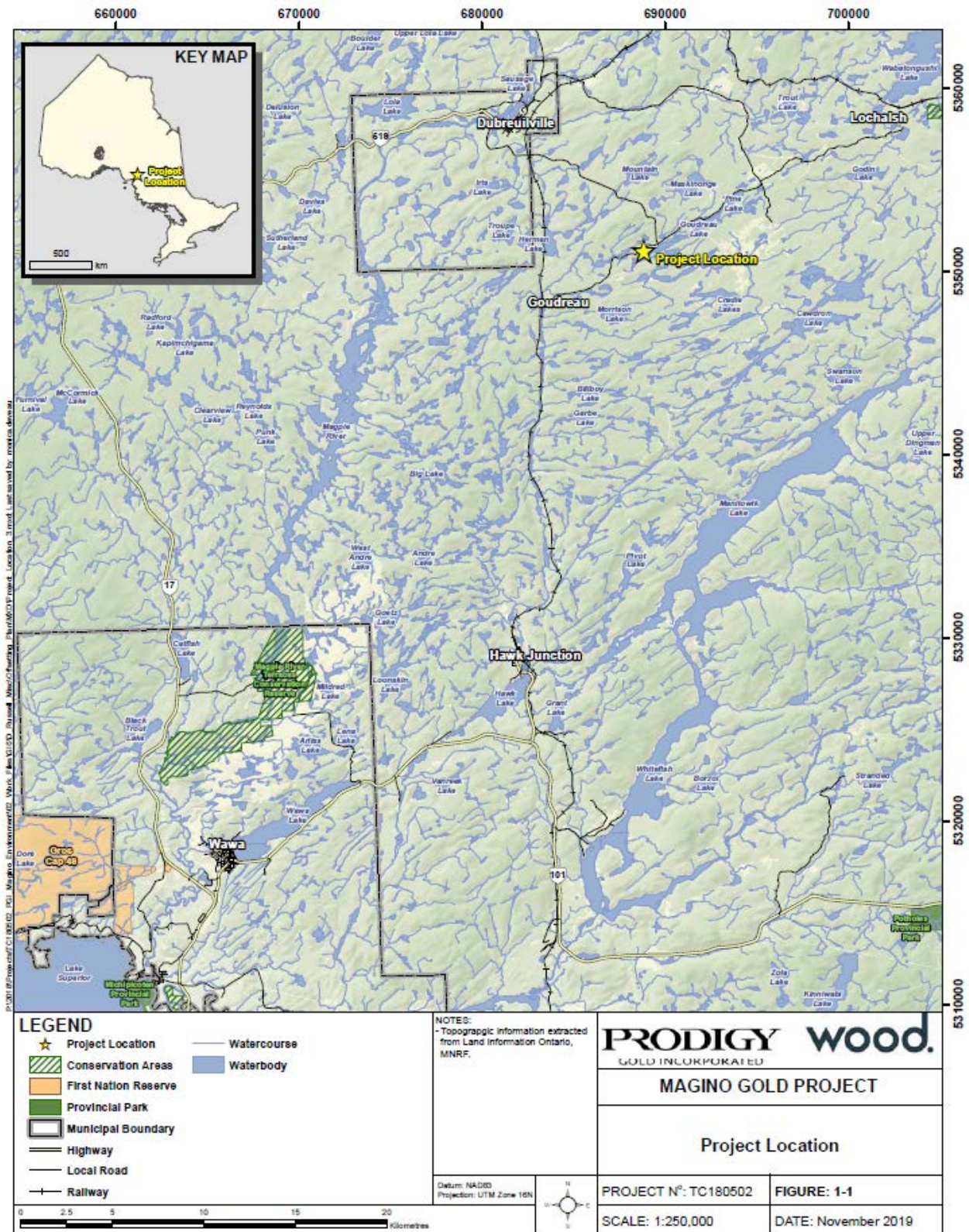
Federal environmental assessment (EA) approval was received via the Decision Statement issued on January 24, 2019. The Statement of Completion (Category B) made under the Ontario Ministry of Natural Resources and Forestry's (MNRF's) Class Environmental Assessment for Resource Stewardship and Facility Development Projects (or Class EA-RSFD) for the Project was issued on March 12, 2019. The parent company of Prodigy, Argonaut Gold, announced the start of construction on February 19, 2021. The Project remained in the construction phase for the remainder of 2021.

This Annual Report is submitted in compliance with condition 2.9 of the federal EA Decision Statement. Prodigy's annual reporting to the Agency will also be reflected as part of Argonaut Gold's overall social responsibility and sustainability program. The Annual Report describes activities undertaken by Prodigy to comply with each of the conditions in the EA Decision Statement during the reporting period January 1 to December 31, 2021. The report is organized so that each section heading addresses a set of conditions as they are laid out in the EA Decision Statement.

Proponent Contact Information:

Kyle Stanfield
Director, Environment & Community Relations
Magino Project
Kyle.Stanfield@argonautgold.com
Telephone: 807-621-6152
Prodigy Gold Incorporated
1 First Canadian Place, Suite 3400
100 King St. W.
P.O. Box 130
Toronto, Ontario
M5X 1A4 Canada

Figure 1: Magino Gold Project Location



2. CONDITIONS AND COMPLIANCE REPORTING

Activities taken by Prodigy in 2021 that are required to comply with the federal EA Decision Statement conditions (January 24, 2019) are described below.

A. General Conditions

A-1 Qualified Individuals / Best Practices

“2.1 The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.”

Response: During 2021, Prodigy continued to engage the services of several reputable consulting companies to provide the qualified professionals (e.g. R.P.Bio., P. Eng., P. Geo.) to implement all activities according to requirements. Prodigy also continued discussions with Indigenous groups in 2021, for example, through communications with the Michipicoten First Nation (MFN) Environmental Committee and meetings with the Missanabie Cree First Nation (MCFN) Environmental Committee, the Métis Nation of Ontario (MNO), the MFN, and Batchewana First Nation (BFN).

A-2 Consultation

“2.2 The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:

- 2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;*
- 2.2.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time taking into account the views of the party or parties being consulted, not to be less than 15 days, to prepare their views and information;*
- 2.2.3 undertake an impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation; and*
- 2.2.4 advise in a timely manner the party or parties being consulted on how the views and information received have been considered by the Proponent.*

2.3 The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent.”

Response: As described in the 2020 Annual Report, following extensive consultation with Indigenous groups and other provincial and federal government departments with respect to the specific individual conditions of the EA Decision Statement, Prodigy provided responses in writing in January 2021 on the draft follow-up programs, plans, and measures, describing how the comments would be considered and/or addressed. Prodigy completed appropriate revisions to the final versions and distributed final

versions of the follow-up programs, plans, and measures required under the EA conditions to the consulted parties as noted in the table below. The updated Groundwater Monitoring Plan was also provided to the consulted parties on April 28, 2021.

Party Consulted	Final Version Provided by Prodigy
Michipicoten First Nation (MFN)	Jan 18, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Missanabie Cree First Nation (MCFN)	Jan 18, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Batchewana First Nation (BFN)	Jan 18, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Métis Nation of Ontario (MNO)	Jan 18, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Red Sky Métis Independent Nation (RSMIN)	Jan 18, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Garden River First Nation (GRFN)	Jan 18, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Impact Assessment Agency of Canada (IAAC) (for federal authorities)	Jan 15, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Transport Canada (TC)	(see IAAC distribution above)
Health Canada (HC)	Jan 15, 2021
Fisheries and Oceans Canada (DFO)	Jan 15, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Natural Resources Canada (NRCan)	Jan 15, 2021
Environment and Climate Change Canada (ECCC)	Jan 15, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Ontario Ministry of Natural Resources and Forestry (MNRF) ¹	Mar 18, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Ontario Ministry of the Environment, Conservation and Parks (MECP)	Mar 18, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>
Ontario Ministry of Energy, Northern Development, and Mines (ENDM)	Mar 18, 2021, <i>updated Groundwater Monitoring Plan Apr 28, 2021</i>

A-3 Follow-up and Adaptive Management

“2.4 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the party or parties being consulted during the development, the following information:

¹ Now the Ministry of Northern Development, Mines, and Natural Resources and Forestry

- 2.4.1 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;
- 2.4.2 the scope, content and frequency of reporting of the results of the follow-up program;
- 2.4.3 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and
- 2.4.4 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.3 have been reached or exceeded and the timing for implementing the modified or additional mitigation measures.”

Response: The follow-up programs as described in EA condition 2.4 were finalized in January 2021, as summarized in the table below. See section A-2 above for additional details on the consultations carried out for the follow-up programs.

#	EA Condition/Annual Report Section	Relevant Plan/Document	EA Condition Requirement for Follow-up Program to Determine/Verify ² :	Topic
1	3.16/Section B. Fish and Fish Habitat	Fish and Fish Habitat Management Plan	The effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting	Fish, fish habitat, blasting
2	3.17, Section B. Fish and Fish Habitat	Fish and Fish Habitat Management Plan	The effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project	Fish salvage, relocation, incidental capture of fish
3	3.18, Section B. Fish and Fish Habitat	Surface Water Monitoring Plan	The accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake	Fish, fish habitat, changes in water and sediment quality
4	3.19, Section B. Fish and Fish Habitat	Groundwater Monitoring Plan	The accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and Goudreau Lake from changes in	Fish, fish habitat, changes in groundwater quality

² See the Decision Statement for the full EA condition; excerpts are shown in this table

#	EA Condition/Annual Report Section	Relevant Plan/Document	EA Condition Requirement for Follow-up Program to Determine/Verify ² :	Topic
			groundwater quality caused by the Designated Project	
5	4.4, Section C. Migratory Birds	Wildlife and Vegetation Management Plan	The accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area	Migratory birds, surface water facilities
6	4.5, Section C. Migratory Birds	Wildlife and Vegetation Management Plan	The effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 to 4.3	Migratory birds, eggs, nests
7	5.3, Section D. Health of Indigenous Peoples	Air/Atmospheric Environment Management Plan	The accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates (TSP), particulate matter (PM ₁₀), fine particulate matter (PM _{2.5}), sulphur dioxide, nitrogen dioxide and cadmium	Health of Indigenous Peoples, air contaminants
8	5.4, Section D. Health of Indigenous Peoples	Surface Water Monitoring Plan	The accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish	Health of Indigenous Peoples, contamination of water and fish
9	6.5, Section E. Current Use of Lands and Resources for Traditional Purposes	Wildlife and Vegetation Management Plan	The accuracy of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>).	Current use of lands and resources for traditional purposes, use of project study area by mammals
10	6.6, Section E. Current Use of Lands and	Traditional Use of Lands and Resources	The accuracy of the environmental assessment and determine the effectiveness of mitigation measures,	Current use of lands and resources

#	EA Condition/Annual Report Section	Relevant Plan/Document	EA Condition Requirement for Follow-up Program to Determine/Verify ² :	Topic
	Resources for Traditional Purposes	Management Plan	including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes.	
11	7.2, Section F. Wetlands	Wildlife and Vegetation Management Plan	The effectiveness of restoration referred to in condition 7.1	Restoration
12	7.3, Section F. Wetlands	Wildlife and Vegetation Management Plan	The accuracy of the environmental assessment as it pertains to the presence of snapping turtle (<i>Chelydra serpentina</i>) or snapping turtle eggs within the project study area	Snapping turtles, eggs

“2.5 The Proponent shall maintain the information referred to in condition 2.4 during the implementation of each follow-up program in consultation with the party or parties being consulted during the development of each follow-up program.

2.6 The Proponent shall provide the follow-up programs referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.

2.7 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement and in consultation with the party or parties being consulted during the development of the follow-up program:

- 2.7.1 conduct the follow-up program according to the information determined pursuant to condition 2.4;*
- 2.7.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);*
- 2.7.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.7.2; and*
- 2.7.4 if modified or additional mitigation measures are required pursuant to condition 2.7.3, develop and implement these mitigation measures in a timely manner and monitor them pursuant to condition 2.7.2.*

2.8 Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for their participation in the development and implementation of the follow-up program, including the analysis of the follow-up results and whether modified or additional mitigation measures are required, as set out in condition 2.7.”

Response: As described in section A-2 above and in the 2020 Annual Report, drafts of the follow-up programs required by the conditions of the EA Decision Statement were provided to the parties being consulted in November and December 2020, prior to their implementation. The final follow-up programs were provided to the parties that were consulted in January and March 2021. No changes were made to the follow-up programs in 2021. An updated version of the *Groundwater Monitoring Plan* was provided to the consulted parties in April 2021, as a correction was made to the Plan. The follow-up programs were implemented in 2021 as set out in EA condition 2.7 and described below. See also the respective sections pertaining to the related EA conditions for additional details. Data collected in 2021 is currently being analyzed and the results of the follow-up programs will be shared with consulted parties when the analysis is complete.

#	EA Condition, Annual Report Section	Follow-up Program Results and Implementation:	Topic
1	3.16, Section B. Fish and Fish Habitat	Prodigy carried out monitoring during the first blasting event on April 20, 2021. No pressure or particle velocity issues that could impact the health of fish were identified.	Fish, fish habitat, blasting
2	3.17, Section B. Fish and Fish Habitat	Prodigy implemented the follow-up program in 2021. Analysis of the results of the fish salvage and relocation to verify the accuracy of the EA and to determine the effectiveness of the relevant mitigation measures was in progress at the end of 2021.	Fish salvage, relocation, incidental capture of fish
3	3.18, Section B. Fish and Fish Habitat	Prodigy carried out water quality monitoring, sediment sampling, and aquatic sampling in 2021. The report on the monitoring and field work to verify the accuracy of the EA and to determine the effectiveness of the relevant mitigation measures was in progress at the end of 2021. As the Magino Gold Project was in the construction phase, there were no specific actions on EA conditions 3.18.1, 3.18.2, 3.18.4.2 and 3.18.4.3 during 2021.	Fish, fish habitat, changes in water and sediment quality
4	3.19, Section B. Fish and Fish Habitat	Prodigy began groundwater quality sampling on April 26, 2021 and sampling was carried out three times during the year (spring freshet, summer, and fall). The annual groundwater monitoring report, which evaluates the results of the 2021 monitoring events to verify the accuracy of the EA and to determine the effectiveness of the relevant mitigation measures was in progress at the end of 2021.	Fish, fish habitat, changes in groundwater quality
5	4.4, Section C. Migratory Birds	<i>Not implemented as the tailing management facility and water quality control pond were not completed in 2021.</i>	Migratory birds, surface water facilities

#	EA Condition, Annual Report Section	Follow-up Program Results and Implementation:	Topic
6	4.5, Section C. Migratory Birds	<i>Not implemented as the Magino Gold project remained in the construction phase in 2021.</i>	Migratory birds, eggs, nests
7	5.3, Section D. Health of Indigenous Peoples	Prodigy established an air quality monitoring station (AM2) and conducted air quality monitoring from August 2021. Analysis of the 2021 data to verify the accuracy of the EA and to determine the effectiveness of the relevant mitigation measures was in progress at the end of 2021.	Health of Indigenous Peoples, air contaminants
8	5.4, Section D. Health of Indigenous Peoples	Prodigy carried out monthly water sampling in Otto Lake starting in February 2021 ³ and collected fish tissue samples in fall 2021. Analysis of the 2021 data in 2022 to verify the accuracy of the EA and to determine the effectiveness of the relevant mitigation measures was in progress at the end of 2021.	Health of Indigenous Peoples, contamination of water and fish
9	6.5, Section E. Current Use of Lands and Resources for Traditional Purposes	Prodigy recorded wildlife sightings in 2021 in a wildlife database that is assessed to determine trends in the movements of black bears and moose in and around the Magino Project site. Based on the monitoring and consistent with EA condition 2.7, Prodigy implemented additional mitigation measures.	Current use of lands and resources for traditional purposes, use of project study area by mammals
10	6.6, Section E. Current Use of Lands and Resources for Traditional Purposes	Prodigy continued to maintain the log of communication with Indigenous groups in 2021. No adverse environmental effects of the Project on the current use of lands and resources for traditional purposes were identified by Indigenous groups in 2021.	Current use of lands and resources
11	7.2, Section F. Wetlands	<i>Not implemented as the Magino Gold project remained in the construction phase in 2021. The wetland restoration referenced will be carried out as part of the reclamation of the tailings management facility at closure.</i>	Restoration
12	7.3, Section F. Wetlands	No snapping turtles or snapping turtle eggs were observed in 2021.	Snapping turtles, eggs

³ An exception was December 2021. No sample was collected from Otto Lake in December due to safety risks associated with thin ice on the lake surface.

A-4 Annual Reporting

“2.9 The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:

- 2.9.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;*
- 2.9.2 how the Proponent complied with condition 2.1;*
- 2.9.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;*
- 2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program;*
- 2.9.5 the results of the follow-up program requirements identified in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3;*
- 2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.7;*
- 2.9.7 any change(s) to the Designated Project in the reporting year for which the Proponent determined that condition 2.14 did not apply.*

2.10 The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.”

Response: This Annual Report is submitted in compliance with conditions 2.9 and 2.10 of the federal EA Decision Statement issued on January 24, 2019. The 2020 Annual Report including an executive summary in both official languages was submitted to the IAAC in March 2021. There were no changes to the Designated Project related to EA condition 2.9.7 in 2021.

A-5 Information Sharing

“2.11 The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the offsetting plan(s) referred to in condition 3.14, the reports related to accidents and malfunctions referred to in conditions 8.4.2 and 8.4.3, the communication plans referred to in conditions 6.1 and 8.5, the schedules referred to in conditions 9.1, and 9.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.

2.12 When the development of a plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency prior to construction, unless otherwise required through the condition.”

Response: In 2021, information sharing activities were completed for the following documents as required by EA conditions 2.11 and 2.12. See section A-2 for additional details regarding the submission of plans to the IAAC. Published documents are found at:

<https://www.argonautgold.com/English/assets/development/magino/default.aspx>.

- The 2020 Annual Report, including the executive summary (English and French), as well as updates to the schedules referenced in EA condition 9.1 (Schedule of EA Decision Statement

Conditions) and EA condition 9.2 (Schedule of All Activities), was published in March 2021; the IAAC, BFN, GRFN, MNO, MFN, MCFN, and RSMIN were notified of the posting by email.

- The offsetting plan referenced in EA condition 3.14 and communications plans referenced in EA conditions 6.1 and 8.5 were published in February and March 2021; the IAAC, BFN, GRFN, MNO, MFN, MCFN, and RSMIN were notified of the posting by email.
- The reports related to accidents and malfunctions referred to in EA conditions 8.4.2 and 8.4.3 (for three incidents: 1. fuel spill on March 24, 2021; 2. fly rock incident on May 14, 2021; 3. fuel spill on June 29, 2021) were published in February and March 2022, and the IAAC, BFN, GRFN, MNO, MFN, MCFN, and RSMIN were notified of the posting by email in February and March 2022.
- The offsetting plan and (draft) communication plans were submitted to the IAAC in 2020 before construction as described in the 2020 Annual Report. The final communication plans were provided to the IAAC in January 2021 before construction. Construction officially commenced on February 19, 2021.

A-6 Change of Proponent

“2.13 The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.”

Response: There was no transfer of ownership, care, control or management of the Designated Project in whole or in part; as such, no related notifications were made in 2021.

A-7 Change to the Designated Project

“2.14 The Proponent shall consult with Indigenous groups, Pic Mobert First Nation and relevant authorities prior to initiating any changes to the Designated Project that may result in adverse environmental effects, and shall notify the Agency in writing no later than 60 days prior to initiating the change(s).

2.15 In notifying the Agency pursuant to condition 2.14, the Proponent shall provide the Agency with a description of the potential adverse environmental effects of the change(s) to the Designated Project, the proposed mitigation measures and follow-up requirements to be implemented by the Proponent and the results of the consultation with Indigenous groups, Pic Mobert First Nation and relevant authorities.”

Response: There was no change to the Designated Project that may result in adverse environmental effects; as such, no related notifications were made in 2021.

B. Fish and Fish Habitat

“3.1 The Proponent shall develop, prior to construction, and implement, during all phases of the Designated Project, measures to control erosion and sedimentation within the project study area. The Proponent shall submit these measures to the Agency before implementing them. Among other measures, the Proponent shall:

Response: Measures to control erosion and sedimentation are included in the *Sediment and Erosion Control Plan* which was submitted to the Agency on January 18, 2021. Erosion and sediment control measures have been implemented since the start of construction on February 19, 2021.

*“3.1.1 Use ditches and diversion berms to maintain stream bank stability; and
3.1.2 Use physical barriers to reduce runoff from disturbed areas.”*

Response: Diversion berms were installed in 2021 along the edges of the haul road. Surface water management dams, diversion berms, and silt fences were also installed in 2021 to reduce runoff from disturbed areas.

“3.2 The Proponent shall comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act.”

Response: Prodigy was compliant with the *Metal and Diamond Mining Effluent Regulations* (MDMER) throughout 2021. In 2021, Prodigy registered an account on the Mine Effluent Reporting System and submitted notification within the 60-day MDMER requirement for the Final Discharge Points at Lovell Lake and Waterbody 3 to ECCC on December 8, 2021.

“3.3: The Proponent shall collect, during construction and operation, contact water for reuse in Designated Project activities, and treat excess contact water that cannot be reused.

3.4 The Proponent shall control the flow at which excess water referred to in condition 3.3 is discharged to limit disturbance of lake bed material.”

Response: Contact water was collected and routed in 2021 through a discharge system that has received an Environmental Compliance Approval (ECA) (Ontario MECP ECA Number 5113-BWZKRY). Excess contact water has been treated in the Lovell Lake Treatment Pond since the pond was commissioned on May 17, 2021.

The flow of excess water discharge was controlled by adjusting the pump settings of the discharge pumps. There have not been any deficiencies to date that would potentially cause disturbance of lake bed material.

“3.5 The Proponent shall install, prior to operation, and use a cyanide destruction circuit during operation to reduce cyanide concentrations in tailings before the tailings are directed to the tailings management facility.”

Response: The installation of the cyanide destruction was not completed in 2021. The installation is currently scheduled to be completed in November 2022.

“3.6 The Proponent shall, after the end of operation and until the open-pit lake is filled, collect and direct contact water to the open-pit lake.”

Response: As the Magino Gold Project was in the construction phase, there was no specific action on EA condition 3.6 during 2021.

3.7 The Proponent shall, prior to operation, implement seepage control measures at the tailings management facility and maintain these measures during operation and decommissioning.

Response: The construction of the tailings management facility was not completed in 2021. The completion of the tailings management facility is currently scheduled to be completed in Q4 2022. The design of the tailings management facility includes seepage control measures.

3.8 The proponent shall not connect the open-pit lake until such time as water in the open-pit lake complies with the pollution prevention provisions of the Fisheries Act.

Response: EA condition 3.8 is an action that would take place at the end of operation. As the Magino Gold Project was in the construction phase in 2021, there was no specific action on EA condition 3.8 during 2021.

3.9 The Proponent shall treat water taking into account the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for Protection of Aquatic Life."

Response: In 2021, Prodigy treated water at the Lovell Lake Treatment Pond and Waterbody 3 Sediment Pond to meet the Canadian Council of Ministers of the Environment (CCME) *Protection of Aquatic Life (PAL) guideline for total suspended solids (TSS)*.

"3.10 The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups, and implement, during blasting activities in or near water, mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives in a manner consistent with the Fisheries Act and its regulations. When developing these measures, the Proponent shall take into account Fisheries and Oceans Canada's Measures to avoid causing harm to fish and fish habitat including aquatic species to risk as it pertains to the use of explosives in or near water. The Proponent shall submit these measures to the Agency before implementing them."

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups, draft measures as required in EA condition 3.10 in 2020. Prodigy finalized the mitigation measures and provided the final measures to the Agency in January 2021. See section A-2 for additional consultation details. Prodigy implemented these measures in 2021.

"3.11 The Proponent shall conduct in-water construction activities during timing windows of least risk for the area, unless otherwise agreed to by relevant federal and provincial authorities. If in-water construction activities cannot be conducted during identified timing windows of least risk, the Proponent shall develop and implement additional mitigation measures, in consultation with Indigenous groups and Fisheries and Oceans Canada, to protect fish during sensitive life stages."

Response: Prodigy conducted in-water construction to install a culvert crossing in McVeigh Creek in November 2021. As this was within the restricted timing window for fall spawning species, Prodigy salvaged fish from the affected area of the creek prior to in-stream work proceeding under the MNRF Fish Licence Authorization 1097823 and DFO Authorization 20-HCAA-02291. Protective measures to

mitigate impacts to fish related to the construction of stream crossings and when work is undertaken in or near water were also implemented. These measures were identified in the *Water Management Plan* and the *Fish and Fish Habitat Management Plan* which were developed in consultation with Indigenous groups and relevant authorities. The in-stream works were carried out according to the DFO's *Measures to Protect Fish and Fish Habitat*. The fish salvage application and culvert crossing designs will also be provided to Indigenous groups in April 2022.

"3.12 The Proponent shall salvage and relocate fish prior to conducting any Designated Project activity requiring removal of fish habitat in a manner consistent with any license issued under the Fisheries Act and its regulations. The Proponent shall salvage and relocate fish in consultation with Indigenous groups and to the satisfaction of Fisheries and Oceans Canada and other relevant authorities."

Response: Prodigy performed fish salvage in 2021 from areas prior to any project activity occurring according to DFO Authorization 20-HCAA-02291. Consultation occurred while obtaining the authorizations from DFO to carry out this work.

"3.13 The Proponent shall design, install and operate the water intake structures in Goudreau Lake in a manner which reduces the incidental capture of fish by entrainment and impingement through the use of an appropriately sized fish screen, taking into account Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline and in a manner consistent with the Fisheries Act and its regulations."

Response: The design of the end-of-pipe fish screen for the Goudreau Lake water intake was in progress in 2021 and is taking into consideration DFO's Guideline, the *Fisheries Act* and its regulations.

"3.14 The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and Environment and Climate Change Canada and in consultation with Indigenous groups, any offsetting plan(s) related to any residual serious harm to fish associated with the carrying out of the Designated Project. The Proponent shall implement the plan. The Proponent shall submit any approved offsetting plan(s) to the Agency prior to implementation."

"3.15 The Proponent shall, for any fish habitat offsetting measure(s) proposed in any offsetting plan(s) referred to in condition 3.14 that may cause adverse environmental effects not considered in the environmental assessment, develop and implement, following consultation with Indigenous groups, Fisheries and Oceans Canada and Environment and Climate Change Canada, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them."

Response: As described in the 2020 Annual Report, Prodigy developed a single Plan document (November 2019, *The Fish Habitat Compensation Plan/Offset Plan*) in compliance with the requirements for both the *MDMER Schedule 2 Fish Habitat Compensation Plan* and *Fisheries Act Paragraph 35(2)(b) Authorization Offset Plan* to mitigate any residual serious harm to fish associated with the carrying out of the Project. The Plan was developed in coordination with the DFO, MNRF, and ECCC and in consultation with Indigenous groups, as previously described in the 2019 Annual Report (March 2020) provided to the IAAC.

Approval of the Schedule 2 authorization was received from the Governor in Council on May 18, 2020. The Plan was submitted as part of the Fisheries Act authorization application process in 2020. This Plan was provided to the IAAC in November 2020.

The *Fish Habitat Compensation Plan/Offset Plan* accounts for measures to mitigate potential impacts arising from implementation of the Plan, and authorization received under the *Fisheries Act* requires monitoring and reporting of the effectiveness of the implementation of the Plan. No additional adverse environmental effects not considered in the EA were identified for fish habitat offsetting measures in the Plan referred to in EA condition 3.14. Prodigy initiated the Plan in 2021.

“3.16 The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting. The Proponent shall implement the follow-up program during blasting activities. As part of the implementation of the follow-up program, the Proponent shall:

- 3.16.1 Monitor instantaneous pressure and particle velocity during the first blasting event;”*
- 3.16.2 If results of the monitoring referred to in condition 3.16.1 indicate an instantaneous pressure change greater than 100 kiloPascals in the swimbladder of fish or that blasting produces a peak particle velocity greater than 13 millimetre per second in a spawning bed, develop, prior to the next blasting event and in consultation with relevant authorities, modified or additional mitigation measures pursuant to condition 2.7 in order to protect fish and fish habitat, including spawning habitat; and”*
- 3.16.3 Implement the modified or additional mitigation measures referred to in condition 3.16.2 during all subsequent blasting events. The Proponent shall submit these measures to the Agency before implementing them.”*

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 3.16 as part of the *Fish and Fish Habitat Management Plan*. Prodigy finalized the follow-up program and provided the final program to the Agency in January 2021. See section A-2 for additional consultation details. Prodigy carried out monitoring during the first blasting event on April 20, 2021. No pressure or particle velocity issues that could impact the health of fish were identified.

“3.17 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project.”

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, and provided to Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 3.17 as part of the *Fish and Fish Habitat Management Plan* during 2020. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January and March 2021. See sections A-2 and A-3 for additional details about the consultation and program. Prodigy implemented the follow-up program in 2021 and the analysis of the results of the fish salvage and relocation was in progress at the end of 2021.

“3.18 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake. The Proponent shall implement the follow-up program during all phases of the Designated Project, including the environmental effects monitoring requirements set out in Schedule 5 of the Metal and Diamond Mining Effluent Regulations.”

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, and provided to Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 3.18 as part of the *Surface Water Monitoring Plan* (Appendix 6-D of the *Water Management Plan*) during 2020. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January and March 2021. See sections A-2 and A-3 for additional details about the consultation and program. As outlined in the Plan, the Environmental Effects Monitoring (EEM) program started in September 2021. The 2021 EEM field work program was completed between September 21 and November 8, 2021. The report for this work, including the analysis of the results, was in progress at the end of 2021.

“As part of the implementation of the follow-up program, the Proponent shall:

3.18.1 Monitor, at least quarterly, concentrations of total phosphorus, mercury, copper, silver, sulphate and ammonia in water during operation;

Response: EA condition 3.18.1 applies to the operations phase and was not applicable in 2021 when the Magino Gold Project was in the construction phase.

3.18.2 Monitor, at least annually, concentrations of copper, arsenic, cadmium, manganese, mercury and total phosphorus in sediments during operation;

Response: EA condition 3.18.2 applies to the operations phase and was not applicable in 2021 when the Magino Gold Project was in the construction phase.

3.18.3 Monitor fish health through fish tissue sampling and fish population studies. Monitoring shall include lower trophic level indicator species and shall include monitoring of fish abundance, fish population structure and other fish health metrics that shall be determined in consultation in Indigenous groups and relevant authorities. The Proponent shall conduct monitoring for one year prior to operation and at least twice a year for the first three years of operation and shall:

3.18.3.1 If the results of monitoring during the first three years of operation demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, continue monitoring every three years after the first three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities; or

3.18.3.2 If the results of monitoring during the first three years of operation demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, determine, in consultation with Indigenous groups and relevant authorities, with what frequency and for what duration additional monitoring shall occur;

Response: The aquatic sampling program is described in the *Surface Water Monitoring Plan* (Appendix 6-D of the *Water Management Plan*). Prodigy carried out the first fish health monitoring event between September 21 and November 8, 2021, as part of the 2021 EEM field work program. The report for this work was in progress at the end of 2021. As the Magino Gold Project was in the construction phase, there were no specific actions on EA conditions 3.18.3.1 and 3.18.3.2 during 2021.

“3.18.4 Monitor nutrient levels, algae abundance, and dissolved oxygen levels. In doing so the Proponent shall:

3.18.4.1 Conduct monitoring one year prior to operation;”

Response: The aquatic sampling program is described in the *Surface Water Monitoring Plan* (Appendix 6-D of the *Water Management Plan*). Prodigy carried out monitoring of nutrient levels, algae abundance and dissolved oxygen levels between September 21 and November 8, 2021, as part of the 2021 EEM field work program. The report for this work was in progress at the end of 2021.

“3.18.4.2 Conduct monitoring at least twice a year for the first three years of operation and:

3.18.4.2.1 If the results of the monitoring referred to in condition 3.18.4.2 demonstrate a statistically significant change with the results of monitoring referred to in condition 3.18.4.1, conduct a fish habitat utilization survey to verify that these changes do not cause adverse environmental effects to fish and fish habitat. The Proponent shall determine the methodology, the frequency and the duration of this survey in consultation with Indigenous groups and relevant authorities.

3.18.4.3 After the third year of operation, the Proponent shall:

3.18.4.3.1 Continue monitoring of nutrient levels, algae abundance and dissolved oxygen levels every three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring; or

3.18.4.3.2 Continue monitoring at a frequency and duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring.”

Response: As the Magino Gold Project was in the construction phase, there were no actions on EA conditions 3.18.4.2 and 3.18.4.3 during 2021.

“3.18.5 if results of the monitoring referred to in conditions 3.18.1, 3.18.2, 3.18.3 or 3.18.4 or the results of the fish habitat utilization survey referred to in condition 3.18.4.2.1 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water and sediment quality, develop and implement modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation and use of an effluent treatment facility. The Proponent shall submit these measures to the Agency before implementing them.”

Response: The 2021 EEM field work program report was in progress at the end of 2021. As a result, modified or additional mitigation measures were not identified during 2021.

“3.19 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and Goudreau Lake from changes in groundwater quality caused by the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project in consultation with Indigenous groups. As part of the implementation of the follow-up program, the Proponent shall...”

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, and provided to Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 3.19 as part of the *Groundwater Monitoring Plan* (Appendix 6-F of the *Water Management Plan*) during 2020. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January and March 2021. See sections A-2 and A-3 for additional details about the consultation and program.

“3.19.1 Monitor groundwater quality using as benchmarks the comparative standards for water quality identified by the Proponent in Table 7-54 of the Environmental Impact Statement; and”

Response: Prodigy began enhanced groundwater quality sampling on April 26, 2021. Sampling events were carried out three times during the year (spring freshet, summer, and fall). The 2021 groundwater quality data will be evaluated against the comparative standards for the annual groundwater monitoring report which is due to be completed and submitted by March 31, 2022.

“3.19.2 If the results of the monitoring referred to in condition 3.19.1 demonstrate that modified or additional mitigation measures are required to mitigate adverse environmental effects on fish and fish habitat of changes in groundwater quality caused by the Designated Project, develop and implement modified or additional mitigation measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.”

Response: The results of the 2021 monitoring events are being evaluated as part of the annual groundwater monitoring report which is due to be completed and submitted by March 31, 2022. As a result, modified or additional mitigation measures were not identified during 2021.

C. Migratory Birds

“4.1 The Proponent shall carry out the Designated Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Avoidance Guidelines and the risk of incidental take. The Proponent's actions when carrying out the Designated Project shall be in compliance with the Migratory Birds Convention Act, 1994, the Migratory Birds Regulations and with the Species at Risk Act.”

Response: Prodigy implemented in 2021 the procedures related to protecting migratory birds in the *Wildlife and Vegetation Management Plan*, which is consistent with EA condition 4.1. A qualified wildlife biologist swept all of the clearing areas for bird nests prior to the start of tree clearing that occurred during the migratory bird season (August 2021). Prodigy also carried out tree clearing in the area surrounding the historical Bat Hibernaculum in August 2021 as authorized under the *Endangered Species Act, 2007* under Ontario MECP Permit Number NR-C-003-19. All other tree clearing occurred outside the migratory bird season.

4.2 The Proponent shall control lighting required during all phases of the Designated Project, including direction, timing and intensity, to avoid adverse environmental effects on migratory birds, while meeting health and safety requirements.”

Response: In 2021, Prodigy implemented the procedures related to controlling light as provided in the *Air/Atmospheric Environment Management Plan* and *Wildlife and Vegetation Management Plan*. Prodigy used light stands on the project site in 2021, which have hoods installed to direct light away from potential offsite nesting areas.

4.3 The Proponent shall undertake, in consultation with Indigenous groups and relevant authorities, progressive reclamation of the project study area. The Proponent shall identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, plant species native to the area of the Designated Project to use for revegetation as part of the progressive reclamation, including species suitable to create habitat for migratory birds.”

Response: As described in the 2020 Annual Report, Prodigy identified possible native species for revegetation in the draft *Closure Plan*, which was provided to Indigenous groups for review in June 2020. Prodigy also identified possible berry species for inclusion in revegetation where possible to acquire, as part of the *Wildlife and Vegetation Management Plan* during 2020. The draft plan was provided for review/comment to Indigenous groups November 2, 2020. Prodigy finalized the plan in January 2021 and provided the final plan to the consulted parties in January and March 2021. See section A-2 for additional consultation details. As the Magino Gold Project was in the construction phase, progressive reclamation did not occur in 2021.

“4.4 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area. As part of the implementation of the follow-up program, the Proponent shall:”

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 4.4 as part of the *Wildlife and Vegetation Management Plan* during 2020. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January and March 2021. See sections A-2 and A-3 for additional details about the consultation and program.

- 4.4.1 Monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the tailings management facility and the water quality control pond during all phases of the Designated Project until such time that water quality in the tailings management facility and the water quality control pond meet legislative requirements and water quality objectives. The water quality objectives are to be established using an ecological risk based approach, developed in consultation with Indigenous groups and relevant authorities;*
- 4.4.2 Monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the open-pit lake during decommissioning. The Proponent shall determine, in consultation with indigenous groups and relevant authorities, the frequency and duration of the monitoring during decommissioning; and*
- 4.4.3 If results of the monitoring referred to in conditions 4.4.1 or 4.4.2 indicate that migratory birds use the tailings management facility, the water quality control pond or the open-pit lake, develop, in consultation with Indigenous groups, and implement deterrence measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them."*

Response: As the Magino Gold Project remained in the construction phase in 2021 and the tailing management facility and water quality control pond were not yet completed, there were no actions on EA conditions 4.4.1 through 4.4.3 during 2021.

"4.5 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 to 4.3. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the progressive reclamation referred to in condition 4.3. The Proponent shall implement the follow-up program during all phases of the Designated Project."

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 4.5 as part of the *Wildlife and Vegetation Management Plan* during 2020. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January 2021 and March 2021. See section A-2 and A-3 for additional details about the consultation and program.

"As part of the implementation of the follow-up program, the Proponent shall:

- 4.5.1 Conduct migratory bird surveys annually for the first three years following completion of construction to assess changes in migratory bird populations caused by the Designated Project. The Proponent shall determine the methodology for the migratory bird surveys in consultation with Indigenous groups and relevant authorities. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities and based on the results of the initial surveys, if*

additional surveys are required after the first three years following completion of construction and at what frequency and in which locations these additional surveys shall occur; and

- 4.5.2 *Monitor the effectiveness of the progressive reclamation referred to in condition 4.3, including the establishment of native plant species to create habitat for migratory birds, annually during operation and during the first three years of decommissioning and every five years thereafter. The Proponent shall monitor the effectiveness of the progressive reclamation referred to in condition 4.3 until the Proponent has determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met.”*

Response: As the Magino Gold Project remained in the construction phase in 2021, there were no actions on EA conditions 4.5.1 and 4.5.2 during 2021.

D. Health of Indigenous Peoples

“5.1 The Proponent shall develop, prior to construction, measures to mitigate emissions of dust and fugitive particulate generated by the Designated Project, including dust associated with mine vehicles on roads located within the property boundary, that take into account the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Ontario's Ambient Air Quality Criteria. The Proponent shall submit these measures to the Agency before implementing them. The Proponent shall implement these measures during construction, operation and the first three years of decommissioning.”

Response: As described in the 2020 Annual Report, Prodigy identified measures as required in EA condition 5.1 and consistent with the previously developed *Fugitive Dust Best Management Practices Plan (FDBMPP)* as part of the draft *Air / Atmospheric Environment Management Plan* in 2020. Prodigy provided the draft Plan to Indigenous groups and relevant authorities in 2020. Prodigy finalized the Plan and provided the final Plan to the IAAC in January 2021, prior to implementation. See section A-2 for additional details about consultation. The dust control measures in the *Air / Atmospheric Environment Management Plan* were implemented in 2021, including watering the haul road and side access roads, using water spray systems on the aggregate crusher, and watering aggregate stockpiles in response to visually identified excessive dust in the air.

“5.2 The Proponent shall undertake reagent handling and ore processing activities in an enclosed space equipped with a dust collection system.”

Response: As the Magino Gold Project remained in the construction phase, there was no specific action on EA condition 5.2 during 2021.

“5.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates, particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), sulphur dioxide, nitrogen dioxide and cadmium. As part of the follow-up program, the Proponent shall:

- 5.3.1 *Identify, prior to construction, monitoring locations for air contaminants within areas used by Indigenous groups for traditional purposes for which maximum concentrations of air contaminants were predicted by the Proponent during the environmental assessment, as*

identified in Appendix N of the final response to Information Request 01 (Canadian Environmental Assessment Registry Reference Number 80044, Document Number 26);”

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 5.3 as part of the *Air/Atmospheric Environment Management Plan* during 2020. The draft Air Quality Follow-up Program outlined an air quality monitoring program, in which monitoring locations were identified in accordance with EA condition 5.3.1. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January and March 2021. See sections A-2 and A-3 for additional details about the consultation and program.

- “5.3.2 Monitor, during construction, operation and the first three years of decommissioning, air contaminants at the monitoring locations identified pursuant to condition 5.3.1, using as benchmarks the standards and criteria set out in the Canadian Council of Ministers of the Environment’s Canadian Ambient Air Quality Standards and Ontario’s Ambient Air Quality Criteria. The Proponent shall monitor fine particulate matter (PM_{2.5}) in real-time, particulate matter (PM₁₀) and cadmium at a minimum every 6 days and total suspended particulates, sulphur dioxide and nitrogen dioxide at a frequency that shall allow the Proponent to monitor adverse environmental effects on human health. The Proponent shall determine the frequency of monitoring for total suspended particulates, Sulphur dioxide and nitrogen dioxide in consultation with Indigenous groups and relevant authorities during the development of the follow-up program;*
- 5.3.3 Notify the Agency and Indigenous groups in writing within 24 hours of any exceedance(s) observed by the Proponent during monitoring referred to in condition 5.3.2 of 1-hour limits or 24-hour limits of the standards and criteria set out in the Canadian Council of Ministers of the Environment’s Canadian Ambient Air Quality Standards and Ontario’s Ambient Air Quality Criteria, except for fine particulate matter (PM_{2.5}); and*
- 5.3.4 Determine, in consultation with Indigenous groups and relevant authorities, the thresholds for concentration of fine particulate matter (PM_{2.5}) above which the Proponent shall notify Indigenous groups.”*

Response: EA condition 5.3.4 and the monitoring frequency specified in 5.3.2. have been addressed as part of the Air Quality Follow-up Program and related consultations described above for EA condition 5.3. Prodigy established an air quality monitoring station (air quality monitoring station (AM) 2) and started air quality monitoring in August 2021 for PM_{2.5}, PM₁₀, TSP, cadmium, sulphur dioxide (SO₂), and nitrogen dioxide (NO₂) at the frequencies set out in the Air Quality Follow-up Program. No exceedances were recorded in 2021. Prodigy is analyzing the 2021 data in 2022 to verify the accuracy of the EA and to determine the effectiveness of the relevant mitigation measures. AM2 was installed during 2021 and stations 1 and 3 will be installed in April 2022.

“5.4 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish.

As part of the follow-up program, the Proponent shall:

5.4.1 Identify, prior to construction, fish species that shall be monitored, waterbodies where Indigenous use is expected and where contaminants shall be monitored;"

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 5.4. The *Surface Water Monitoring Plan* (Appendix 6-D of the *Water Management Plan*) fulfills the requirements related to the follow-up program, as well as other obligations. The draft *Surface Water Monitoring Plan* identified fish species to be monitored, waterbodies where Indigenous use is expected and where contaminants will be monitored as required in EA condition 5.4.1. Prodigy finalized the Plan in January 2021 and provided the final Plan to consulted parties in January and March 2021. See sections A-2 and A-3 for additional details about the consultation and program.

" As part of the follow-up program, the Proponent shall:..."

5.4.2 Monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during all phases of the Designated Project;"

5.4.3 Monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during decommissioning;"

5.4.4 Monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years during all phases of the Designated Project, starting the first year of construction, and every five years after the end of decommissioning. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities, if additional monitoring must be implemented after the end of decommissioning; and"

5.4.5 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years starting at the beginning of decommissioning and for a duration that shall be determined in consultation with Indigenous groups and relevant authorities."

Response: As the project was in the construction phase in 2021, there were no actions on EA conditions 5.4.3 and 5.4.5. Regarding EA condition 5.4.2, Prodigy carried out monthly water sampling in Otto Lake and Herman Lake (downstream waterbody) according to the *Surface Water Monitoring Plan* (Appendix 6-D of the *Water Management Plan*), starting in February 2021 with the exception of December 2021 where water could not be sampled due to safety risks associated with thin ice on the lake. In accordance with EA condition 5.4.4, Prodigy also collected fish tissue samples from Otto Lake, Herman Creek and McVeigh Creek (downstream waterbodies) in October-November 2021 as part of the EEM study. Prodigy is analyzing the 2021 data in 2022 to verify the accuracy of the EA and to determine the effectiveness of the relevant mitigation measures.

E. Current Use of Lands and Resources for Traditional Purposes

"6.1 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Designated Project and the adverse environmental effects of the Designated Project with Indigenous groups. The Proponent shall implement and maintain the

communication plan up-to-date during all phases of the Designated Project. The communication plan shall include procedures, including timing and methods, for sharing information on the following:

- 6.1.1 the location and timing of Designated Project activities that may affect quality of experience to Indigenous uses of lands for traditional purposes caused by changes in dust, noise or light within the property boundary and that may permanently or temporarily affect navigation within the project study area;*
- 6.1.2 the results of the follow-up program referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2, and 7.3, including any potential health risks, in plain language, and the modified or additional mitigation measures developed and implemented by the Proponent pursuant to condition 2.7 for each follow-up program.*

6.2 The Proponent shall develop, as part of the communication plan referred to in condition in 6.1, procedures for Indigenous groups to provide feedback to the Proponent about adverse environmental effects caused by the Designated Project related to access to and use of lands for traditional purposes, and procedures for the Proponent to document and respond in a timely manner to the feedback received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups, a draft communication plan as required in EA conditions 6.1 and 6.2 as part of the *Indigenous Engagement Plan* during 2020. Prodigy finalized the Plan in January 2021 and provided the final plan to the parties consulted in January 2021. See sections A-2 and A-5 for additional details about the consultation and information sharing. The communication plan was implemented in 2021. No adverse environmental effects were identified in 2021.

6.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a Historic Resources Management Plan for structures, sites, or things of historical, archaeological, paleontological, or architectural significance. The Proponent shall implement the plan during all phases of the Designated Project. As part of the plan, for any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the property boundary by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated project, the Proponent shall:

- 6.3.1 immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery;*
- 6.3.2 delineate an area with a radius of at least 30 metres around the discovery as a no-work zone and monitor any work conducted within 50 metres around the discovery;*
- 6.3.3 conduct an assessment at the location of the discovery;*
- 6.3.4 inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in the archeological work; and*
- 6.3.5 consult Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance.*

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups, a draft *Historic Resources Management Plan* as required in EA condition 6.3 during 2020. Prodigy finalized the Plan in January 2021 and provided the final Plan to consulted parties in January and March 2021. See sections A-2 for additional consultation details. The *Historic Resources Management Plan* was implemented in 2021. No previously unidentified structures, sites, or things of historical, archaeological, paleontological or architectural significance were identified within the property boundary in 2021.

6.4 As part of the progressive reclamation referred to in condition 4.3, the Proponent shall:

- 6.4.1 identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, species of interest to Indigenous peoples to use for revegetation as part of the progressive reclamation; and*
- 6.4.2 develop, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, measures to manage the spread of invasive species. The Proponent shall submit these measures to the Agency before implementing them.*

Response: As described in the 2020 Annual Report, regarding EA condition 6.4.1, Prodigy identified possible native species for revegetation in the draft *Closure Plan* and identified possible berry species for inclusion in revegetation where possible, as part of the *Wildlife and Vegetation Management Plan* during 2020. The draft plan was provided for review/comment to Indigenous groups and relevant authorities in 2020. Prodigy also developed, in consultation with Indigenous groups and relevant authorities, draft measures as required in EA condition 6.4.2 as part of the draft *Invasive Species Management Plan* during 2020. In addition, Prodigy developed, in consultation with Indigenous groups and relevant authorities, protection measures to mitigate environmental harms associated with terrestrial vegetation (e.g., for revegetation/rehabilitation activities) as part of the draft *Wildlife and Vegetation Management Plan* during 2020. Prodigy finalized the Plans in January 2021 and provided the final Plans to consulted parties in January and March 2021. See section A-2 for additional consultation details. As required in EA condition 6.4.2, Prodigy implemented the measures mentioned above to manage the spread of invasive species in 2021. Prodigy ensured that trucks and equipment from outside the Lake Superior region were thoroughly cleaned and inspected before they were approved to enter the project site.

*6.5 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (*Ursus americanus*) and moose (*Alces alces*). As part of the development of the follow-up program, the Proponent shall identify, in consultation with Indigenous groups and relevant authorities, species of mammals, in addition to black bear (*Ursus americanus*) and moose (*Alces alces*), that shall be monitored. If the results of the monitoring indicate that these mammal species use the property, the Proponent shall implement modified or additional mitigation measures pursuant to condition 2.7 to prevent the identified species of mammals from accessing Designated Project components.*

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 6.5 as part of the draft *Wildlife and Vegetation Management Plan*. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January and March 2021. See sections A-2 and A-3 for additional consultation and program details.

Prodigy recorded wildlife sightings in 2021 in a wildlife database that is assessed to determine trends in the movements of black bears and moose in and around the Magino Gold Project site. Based on the monitoring and consistent with EA condition 2.7, Prodigy implemented additional mitigation measures in 2021. These measures included the use of bear-proof food waste bins, personnel training and workplace bulletins. The training and bulletins informed workers of appropriate waste handling and worker behaviors to eliminate wildlife attractants and minimize the potential for hazardous wildlife

interactions at the site. Wildlife monitoring continued in 2021 after the implementation of these measures. Analysis of this additional monitoring data is currently in progress and was not completed in 2021.

6.6 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures, including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project.”

Response: As described in the 2020 Annual Report, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 6.6 as part of the draft *Traditional Use of Lands and Resources Management Plan* during 2020. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January and March 2021. See sections A-2 and A-3 for additional consultation and program details. Prodigy implemented the follow-up program in 2021 including the continued maintenance of the log of communication with Indigenous groups. No adverse environmental effects of the Project on the current use of lands and resources for traditional purposes were identified by Indigenous groups in 2021.

F. Wetlands

“7.1 The Proponent shall restore a minimum of 40 hectares of wetland within the property boundary. The Proponent shall determine, in consultation with Environment and Climate Change Canada, methods for restoration that are technically and economically feasible and that are appropriate for the project study area.”

Response: As the Magino Gold Project remained in the construction phase, there was no specific action on EA condition 7.1 during 2021. As restoration of the wetland area will be done as part of the reclamation of the Tailings Management Facility at closure, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.

“7.2 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of restoration referred to in condition 7.1. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the restoration. The Proponent shall monitor the effectiveness of the restoration from the start of the restoration until performance indicators are met.”

Response: As described in the 2020 Annual Report, Prodigy developed in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 7.2 as part of the draft *Wildlife and Vegetation Management Plan* during 2020. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January and March 2021. See sections A-2 and A-3 for additional details about the consultation and program.

As restoration of the wetland area under EA condition 7.1 will be carried out as part of the reclamation of the Tailings Management Facility at closure, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.

*“7.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of snapping turtle (*Chelydra serpentina*) or snapping turtle eggs within the project study area. The Proponent shall implement the follow-up program during construction and operation. If the Proponent observes snapping turtle or snapping turtle eggs, the Proponent shall develop, in consultation with Indigenous groups and relevant authorities, modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation of exclusion fences around snapping turtle habitat, if technically feasible, or the relocation of snapping turtles outside of the project study area. The Proponent shall submit these measures to the Agency before implementing them.”*

Response: As described in the 2020 Annual Report, Prodigy developed in consultation with Indigenous groups and relevant authorities, a draft follow-up program and measures related to snapping turtles as required in EA condition 7.3 as part of the draft *Wildlife and Vegetation Management Plan* during 2020. Prodigy finalized the program in January 2021 and provided the final program to consulted parties in January and March 2021. See sections A-2 and A-3 for additional consultation and program details. Prodigy implemented the follow-up program in 2021. No snapping turtles or snapping turtle eggs were observed in 2021.

G. Accidents and Malfunctions

“8.1 The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.”

8.2 The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.

8.3 The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an accident and malfunction response plan in relation to the Designated Project. The accident and malfunction plan shall include:

- 8.3.1 the types of accidents and malfunctions that may cause adverse environmental effects;*
- 8.3.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 8.3.1 to mitigate any adverse environmental effect(s) caused by the accident or malfunction; and*
- 8.3.3 the role of Indigenous groups in the implementation of the accident and malfunction plan.”*

Response: Prodigy developed a draft *Accident and Malfunction Response Plan* in consultation with Indigenous groups and relevant authorities in 2020 as reported in the 2020 Annual Report to IAAC, which includes measures to prevent accidents and malfunctions as well as respond to them. Prodigy finalized the Plan in January 2021 and provided the final program to consulted parties in January and March 2021. See section A-2 for consultation details.

“8.4 In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall immediately implement the measures appropriate to the accident or malfunction as described in the accident and malfunction response plan referred to in condition 8.3.2 and shall:

- 8.4.1 *Notify, as soon as possible, Indigenous groups and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. For the notification to Indigenous groups and the Agency, the Proponent shall specify:*
- 8.4.1.1 *the date the accident or malfunction occurred;*
 - 8.4.1.2 *a description of the accident or malfunction;*
 - 8.4.1.3 *a list of any substances potentially released in the environment as a result of the accident or malfunction.*
- 8.4.2 *Submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:*
- 8.4.2.1 *a detailed description of the accident or malfunction and of its adverse environmental effects and any associated potential health risks;*
 - 8.4.2.2 *a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;*
 - 8.4.2.3 *any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects, the associated potential health risks and the measures taken by the Proponent to mitigate these adverse environmental effects;*
 - 8.4.2.4 *a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and*
 - 8.4.2.5 *details concerning the implementation of the accident or malfunction response plan referred to in condition 8.3.*
- 8.4.3 *Submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 8.4.2. The report shall include all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 9.4.2.3 were received by the Proponent.”*

Response: In 2021 there were three incidents that were externally reportable by the criteria specified in the *Accident and Malfunction Response Plan*. The following provides the dates IAAC, relevant authorities and Indigenous groups were notified, and when the 30-day and 90-day reports were submitted to the Agency in accordance with EA conditions 8.4.1 through 8.4.3:

1. March 24, 2021 fuel spill
 - a. Notification to IAAC, relevant authorities and Indigenous groups: March 28, 2021
 - b. Submission of 30-day report: April 22, 2021
 - c. Submission of 90-day report: June 18, 2021
2. May 14, 2021 fly rock incident

- a. Notification to IAAC, relevant authorities and Indigenous groups: May 15, 2021
 - b. Submission of 30-day report: June 18, 2021
 - c. Submission of 90-day report: August 12, 2021
3. June 29, 2021 fuel spill
- a. Notification to IAAC, relevant authorities and Indigenous groups: June 30, 2021
 - b. Submission of 30-day report: July 29, 2021
 - c. Submission of 90-day report: A report was not submitted in 2021; however, an overdue report was submitted on March 24, 2022.

“8.5 The Proponent shall develop a communication plan in consultation with Indigenous groups. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:

- 8.5.1 the types of accident and malfunction requiring the Proponent to notify the respective Indigenous groups;*
- 8.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups to assist in the response to the accident or malfunction; and*
- 8.5.3 the contact information of the representatives of the Proponent that the Indigenous groups may contact and of the representatives of the respective Indigenous groups to which the Proponent provides notification.”*

Response: Prodigy developed a draft *Accident and Malfunction Response Plan* which included a communication plan in consultation with Indigenous groups and relevant authorities in 2020. Prodigy finalized the Plan in January 2021 and provided the final Plan to consulted parties in January and March 2021. See section A-2 for consultation details.

H. Schedules

“9.1 The Proponent shall submit to the Agency a schedule for all conditions set out in this Decision Statement no later than 60 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.

9.2 The Proponent shall submit to the Agency a schedule outlining all activities required to carry out all phases of the Designated Project no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.

9.3 The Proponent shall submit to the Agency in writing an update to schedules referred to in conditions 9.1 and 9.2 every year no later than March 31, until completion of all activities referred to in each schedule.

9.4 The Proponent shall provide to the Agency revised schedules if any change is made to the initial schedules referred to in conditions 9.1 and 9.2 or to any subsequent update(s) referred to in condition 9.3, upon revision of the schedules.

9.5 The Proponent shall provide Indigenous groups with the schedules referred to in conditions 9.1 and 9.2 and the updates or revisions to the initial schedules pursuant to condition 9.3 and 9.4 at the same time the Proponent provides these documents to the Agency.”

Response: Further to the initial versions of the two schedules (*Schedule of EA Decision Statement Conditions*, EA Condition 9.1; and *Schedule of All Activities*, EA Condition 9.2) submitted by Prodigy to the IAAC in 2020 in advance of construction, as required in EA conditions 9.1 and 9.2, Prodigy submitted an update to these two schedules in March 2021 as part of the 2020 Annual Report.

In accordance with EA condition 9.5, Prodigy also provided the initial schedules to Indigenous groups (MFN, MCFN, BFN, MNO, GRFN, and RSMIN) in October 2020 and the updated schedules in March 2021.

As required in EA condition 9.3, Prodigy is submitting the update to these two schedules by March 31, 2022, as part of this Annual Report in Appendices B and C. This includes changes, which result from ongoing evaluation of project progress.

No revisions were made to the updated March 2021 schedules; as such, no revised schedules were provided to the IAAC in 2021 under EA condition 9.4.

I. Record Keeping

“10.1 The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.

10.2 The Proponent shall retain all records referred to in condition 10.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.

10.3 The Proponent shall notify the Agency of any change to the contact information of the Proponent included in this Decision Statement.”

Response: Prodigy has maintained all records relevant to the implementation of the conditions set out in the January 24, 2019 EA Decision Statement. In 2021, these records were retained at Argonaut Gold’s Toronto office:

1 First Canadian Place Suite 3400
100 King Street West
P.O. Box 130
Toronto, Ontario
M5X 1A4 Canada

These records were also maintained at the Dubreuilville office:

21 Rue des Pins
P.O. Box 370
Dubreuilville, Ontario

POS 1B0 Canada

The Dubreuilville office is part of the same Prodigy office complex identified in the 2020 Annual Report. Similarly, while there has been a change to the suite number, the Toronto office remains at the same physical local identified in the 2020 Annual Report. The contact for the Proponent remains the same as in the 2020 Annual Report and the EA Decision Statement (Kyle Stanfield, Director Environment and Community Relations). However, as above, there has been a change to the associated mailing address for the Proponent.

APPENDIX A: CONCORDANCE TABLE - EA CONDITIONS (JANUARY 2019) VS. ANNUAL REPORT SECTIONS

January 24, 2019 EA Conditions: Applicable Sections	EA Condition(s)	Annual Report Section
General Conditions		
Qualified Individuals / Best Practices	Condition 2.1	Section 2.A-1
Consultation	Conditions 2.2-2.3	Section 2.A-2
Follow-up and Adaptive Management	Conditions 2.4-2.8	Section 2.A-3
Annual Reporting	Conditions 2.9-2.10	Section 2.A-4
Information Sharing	Conditions 2.11-2.12	Section 2.A-5
Change of Proponent	Condition 2.13	Section 2.A-6
Change to the Designated Project	Conditions 2.14-2.15	Section 2.A-7
Fish and Fish Habitat	Conditions 3.1-3.19	Section 2.B
Migratory Birds	Conditions 4.1-4.5	Section 2.C
Health of Indigenous Peoples	Conditions 5.1-5.4	Section 2.D
Current Use of Lands and Resources for Traditional Purposes	Conditions 6.1-6.6	Section 2.E
Wetlands	Conditions 7.1-7.3	Section 2.F
Accidents and Malfunctions	Conditions 8.1-8.5	Section 2.G
Schedules	Conditions 9.1-9.5	Section 2.H, Appendices B and C
Record Keeping	Conditions 10.1-10.3	Section 2.I

APPENDIX B: SCHEDULE OF EA DECISION STATEMENT CONDITIONS (EA CONDITION 9.1)

Table 1: Schedule of Key Project Milestones

Project Phase	Years	Estimated Duration
Construction	2 years	February 2021 – March 2023 (construction)
Operation	15 years	April 2023 – December 2038
Decommissioning (i.e., Active Closure)	3 years	January 2039 – December 2041
Abandonment (i.e., Post-Closure)	Approximately 50 years; includes 7 years of Active Monitoring until closure objectives are satisfied (in addition to Active Monitoring undertaken during Decommissioning) followed by Passive Abandonment	January 2042 – December 2048 (Active Monitoring); January 2042-December 2091 (full Abandonment including Passive Abandonment)

Table 2: Magino Gold Project EA Decision Statement Condition Implementation Schedule– EA Condition 9.1

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	General Conditions			
	Qualified Individuals / Best Practices			
2.1	<p>“The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.”</p>	January 2019	End of all Project phases (on or about December 2091)	
	Consultation			
2.2	<p>“The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:</p> <p>2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;</p> <p>2.2.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time taking into account the views of</p>	January 2019	End of all Project phases (on or about December 2091)	Prodigy has continued to consult with stakeholders and Indigenous groups on EA conditions and related topics since the EA Decision Statement was issued by the IAAC.

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>the party or parties being consulted, not to be less than 15 days, to prepare their views and information;</p> <p>2.2.3 undertake an impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation; and</p> <p>2.2.4 advise in a timely manner the party or parties being consulted on how the views and information received have been considered by the Proponent.”</p>			
2.3	<p>“The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to .be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent.”</p>	January 2019	End of all Project phases (on or about December 2091)	
Follow-up and Adaptive Management				
2.4	<p>“The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the</p>	October 2020	January 2021	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>party or parties being consulted during the development, the following information:</p> <p>2.4.1 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;</p> <p>2.4.2 the scope, content and frequency of reporting of the results of the follow-up program;</p> <p>2.4.3 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and</p> <p>2.4.4 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.3 have been reached or exceeded and the timing for implementing the modified or additional mitigation measures.”</p>			
2.5	<p>“The Proponent shall maintain the information referred to in condition 2. 4 during the implementation of each follow-up program in consultation with the party or</p>	January 2021	End of all Project phases (on or about December 2091)	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	parties being consulted during the development of each follow-up program.”			
2.6	“The Proponent shall provide the follow-up programs referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.”	January 2021	On or about January 2024-	Updates to be provided if/when necessary
2.7	<p>“The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement and in consultation with the party or parties being consulted during the development of the follow-up program:</p> <p>2.7.1 conduct the follow-up program according to the information determined pursuant to condition 2.4;</p> <p>2.7.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);</p> <p>2.7.3 determine whether modified or additional mitigation measures are required based on the</p>	February 2021 at the earliest	On or about December 2048	<p>Follow up programs have been developed and outline the requirements for monitoring and implementation of mitigations.</p> <p>Follow-up programs allow for adaptive management to ensure mitigations where required are changed or amended to manage the identified impact.</p> <p>Project follow-up programs verify the accuracy of the EA and</p>

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>monitoring and analysis undertaken pursuant to condition 2.7.2; and</p> <p>2.7.4 if modified or additional mitigation measures are required pursuant to condition 2.7.3, develop and implement these mitigation measures in a timely manner and monitor them pursuant to condition 2.7.2.”</p>			describe the process for mitigating any additional effects identified during monitoring.
2.8	<p>“Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for their participation in the development and implementation of the follow-up program, including the analysis of the follow-up results and whether modified or additional mitigation measures are required, as set out in condition 2.7”</p>	October 2020	On or about December 2038	
Annual Reporting				
2.9	<p>“The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:</p> <p>2.9.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;</p> <p>2.9.2 how the Proponent complied with condition 2.1;</p>	January 2019	On or about December 2041	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
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	<p>2.9.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;</p> <p>2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program;</p> <p>2.9.5 the results of the follow-up program requirements identified in conditions 3.16, 3.17, 3.18,3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3;</p> <p>2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.7;</p> <p>2.9.7 any change(s) to the Designated Project in the reporting year for which the Proponent determined that condition 2.14 did not apply.”</p>			
2.10	“The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.”	March 2020 (2019 Annual Report)	On or about December 2041	The first annual report for 2019 was submitted in March 2020.
	Information Sharing			
2.11	“The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions	April 2020 (2019 Annual Report)	On or about December 2063	Documents are/will be published on the Prodigy Gold website at

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	2.9 and 2.10, the offsetting plan(s) referred to in condition 3.14, the reports related to accidents and malfunctions referred to in conditions 8.4.2 and 8.4.3, the communication plans referred to in conditions 6.1 and 8.5, the schedules referred to in conditions 9.1, and 9.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.”			https://www.argonautgold.com/English/assets/development/magino/default.aspx as they are submitted to the IAAC
2.12	“When the development of a plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency prior to construction, unless otherwise required through the condition.”	November 2020	January 2021	
Change of Proponent				
2.13	“The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.”	As required	End of all Project phases (on or about December 2091)	No transfer has occurred to date
Change to the Designated Project				

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2.14	“The Proponent shall consult with Indigenous groups, Pic Mobert First Nation and relevant authorities prior to initiating any changes to the Designated Project that may result in adverse environmental effects, and shall notify the Agency in writing no later than 60 days prior to initiating the change(s).”	As required	End of all Project phases (on or about December 2091)	No changes to the Designated Project that may result in adverse environmental effects have been proposed/initiated to date
2.15	“In notifying the Agency pursuant to condition 2.14, the Proponent shall provide the Agency with a description of the potential adverse environmental effects of the change(s) to the Designated Project, the proposed mitigation measures and follow-up requirements to be implemented by the Proponent and the results of the consultation with Indigenous groups, Pic Mobert First Nation and relevant authorities.”	As required	End of all Project phases (on or about December 2091)	No changes to the Designated Project that may result in adverse environmental effects have been proposed/initiated to date
Fish and Fish Habitat				
3.1	“The Proponent shall develop, prior to construction, and implement, during all phases of the Designated Project, measures to control erosion and sedimentation within the project study area. The Proponent shall submit these measures to the Agency before implementing them. Among other measures, the Proponent shall:	October 2020	On or about December 2041	
	3.1.1 use ditches and diversion berms to maintain stream bank stability; and	February 2021		
	3.1.2 use physical barriers to reduce runoff from disturbed areas.”	February 2021		

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3.2	“The Proponent shall comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the <i>Fisheries Act</i> .”	February 2021	End of all Project phases (on or about December 2091)	
3.3	“The Proponent shall collect, during construction and operation, contact water for reuse in Designated Project activities, and treat excess contact water that cannot be reused.”	May 2021	On or about December 2038	
3.4	“The Proponent shall control the flow at which excess water referred to in condition 3.3 is discharged to limit disturbance of lake bed material.”	May 2021	On or about December 2038	
3.5	“The Proponent shall install, prior to operation, and use a cyanide destruction circuit during operation to reduce cyanide concentrations in tailings before the tailings are directed to the tailings management facility.”	Q4 2022	On or about December 2038	
3.6	“The Proponent shall, after the end of operation and until the open-pit lake is filled, collect and direct contact water to the open-pit lake.”	On or about January 2039	On or about December 2088	
3.7	“The Proponent shall, prior to operation, implement seepage control measures at the tailings management facility and maintain these measures during operation and decommissioning.”	Q4 2022	On or about December 2041	
3.8	“The proponent shall not connect the open-pit lake until such time as water in the open-pit lake complies with the pollution prevention provisions of the <i>Fisheries Act</i> .”	June 2039	June 2082	Corresponds to 43 years of pit filling, commencing at the end of operations phase. May start up to 3 years earlier, if mining stops and only ore stockpile processing is happening at end of life

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3.9	“The Proponent shall treat water taking into account the Canadian Council of Ministers of the Environment’s <i>Canadian Water Quality Guidelines for Protection of Aquatic Life.</i> ”	May 2021	On or about December 2038	
3.10	“The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups, and implement, during blasting activities in or near water, mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives in a manner consistent with the <i>Fisheries Act</i> and its regulations. When developing these measures, the Proponent shall take into account Fisheries and Oceans Canada’s Measures to avoid causing harm to fish and fish habitat including aquatic species at risk as it pertains to the use of explosives in or near water. The Proponent shall submit these measures to the Agency before implementing them.”	October 2020	On or about December 2038	
3.11	“The Proponent shall conduct in-water construction activities during timing windows of least risk for the area, unless otherwise agreed to by relevant federal and provincial authorities. If in-water construction activities cannot be conducted during identified timing windows of least risk, the Proponent shall develop and implement additional mitigation measures, in consultation with Indigenous groups and Fisheries and Oceans Canada, to protect fish during sensitive life stages.”	Q2 2022	On or about March 2023	
3.12	“The Proponent shall salvage and relocate fish prior to conducting any Designated Project activity requiring	October 2020	September 2022	Additional fish salvage will be performed in

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	removal of fish habitat in a manner consistent with any license issued under the <i>Fisheries Act</i> and its regulations. The Proponent shall salvage and relocate fish in consultation with Indigenous groups and to the satisfaction of Fisheries and Oceans Canada and other relevant authorities.”			sections of McVeigh Creek in 2022 that will be impacted by the southwest overburden stockpile and a portion of Waterbody 10
3.13	“The Proponent shall design, install and operate the water intake structures in Goudreau Lake in a manner which reduces the incidental capture of fish by entrainment and impingement through the use of an appropriately sized fish screen, taking into account Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline and in a manner consistent with the <i>Fisheries Act</i> and its regulations.”	February 2021	On or about March 2041	
3.14	“The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and Environment and Climate Change Canada and in consultation with Indigenous groups, any offsetting plan(s) related to any residual serious harm to fish associated with the carrying out of the Designated Project. The Proponent shall implement the plan. The Proponent shall submit any approved offsetting plan(s) to the Agency prior to implementation.”	January 2019	On or about January 2033	Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted.
3.15	“The Proponent shall, for any fish habitat offsetting measure(s) proposed in any offsetting plan(s) referred to in condition 3.14 that may cause adverse	N/A	N/A	No measures are proposed in plan(s) referred to in EA

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Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
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	environmental effects not considered in the environmental assessment, develop and implement, following consultation with Indigenous groups, Fisheries and Oceans Canada and Environment and Climate Change Canada, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them.”			condition 3.14 that may cause adverse environmental effects not considered in the EA
3.16	<p>“The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting. The Proponent shall implement the follow-up program during blasting activities. As part of the implementation of the follow-up program, the Proponent shall:</p> <p>3.16.1 monitor instantaneous pressure and particle velocity during the first blasting event;</p> <p>3.16.2 if results of the monitoring referred to in condition 3.16.1 indicate an instantaneous pressure change greater than 100 kilo Pascals in the swim bladder of fish or that blasting produces a peak particle velocity greater than 13 millimetre per second in a spawning bed, develop, prior to the next blasting event and in consultation with relevant authorities, modified or additional mitigation measures pursuant to condition</p>	October 2020	On or about March 2023	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.

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	<p>2.7 in order to protect fish and fish habitat, including spawning habitat; and</p> <p>3.16.3 implement the modified or additional mitigation measures referred to in condition 3.16.2 during all subsequent blasting events. The Proponent shall submit these measures to the Agency before implementing them.”</p>			
3.17	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project.”</p>	October 2020	On or about December 2038	<p>Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.</p>

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Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
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				Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted.
3.18	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake. The Proponent shall implement the follow-up program during all phases of the Designated Project, including the environmental effects monitoring requirements set out in Schedule 5 of the <i>Metal and Diamond Mining Effluent Regulations</i> . As part of the implementation of the follow-up program, the Proponent shall:	October 2020	On or about December 2041	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects.

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Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
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	3.18.1 monitor, at least quarterly, concentrations of total phosphorus, mercury, copper, silver, sulphate and ammonia in water during operation;	April 2023	On or about December 2038	Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	3.18.2 monitor, at least annually, concentrations of copper, arsenic, cadmium, manganese, mercury and total phosphorus in sediments during operation;	April 2023	On or about December 2038	
	3.18.3 monitor fish health through fish tissue sampling and fish population studies. Monitoring shall include lower trophic level indicator species and shall include monitoring of fish abundance, fish population structure and other fish health metrics that shall be determined in consultation with Indigenous groups and relevant authorities. The Proponent shall conduct monitoring for one year prior to operation and at least twice a year for the first three years of operation and shall:	October 2021	On or about December 2038	
	3.18.3.1 if the results of monitoring during the first three years of operation demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, continue monitoring every three years after the first three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities; or	On or about April 2023	On or about December 2028 (at a minimum; duration to be determined in consultation with Indigenous groups and relevant authorities)	

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	3.18.3.2 if the results of monitoring during the first three years of operation demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, determine, in consultation with Indigenous groups and relevant authorities, with what frequency and for what duration additional monitoring shall occur;	On or about April 2023	On or about December 2025 (at a minimum; determine duration in consultation with Indigenous groups and relevant authorities)	
	3.18.4 monitor nutrient levels, algae abundance, and dissolved oxygen levels. In doing so the Proponent shall: 3.18.4.1 conduct monitoring one year prior to operation;	September 2021	On or about March 2023	
	3.18.4.2 conduct monitoring at least twice a year for the first three years of operation and:	On or about April 2023	On or about December 2025	
	3.18.4.2.1 if the results of the monitoring referred to in condition 3.18.4.2 demonstrate a statistically significant change with the results of monitoring referred to in condition 3.18.4.1, conduct a fish habitat utilization survey to verify that these changes do not cause adverse environmental effects to fish and fish habitat. The Proponent shall determine the methodology, the frequency and the duration of this survey in consultation with Indigenous groups and relevant authorities.	On or about April 2023	After December 2025 (survey duration to be determined in consultation with Indigenous groups and relevant authorities)	

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	<p>3.18.4.3 after the third year of operation, the Proponent shall:</p> <p>3.18.4.3.1 continue monitoring of nutrient levels, algae abundance and dissolved oxygen levels every three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring; or</p>	After December 2025	On or about December 2028 (at a minimum, duration to be determined in consultation with Indigenous groups and relevant authorities)	
	<p>3.18.4.3.2 continue monitoring at a frequency and duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring.</p>	After December 2025	December 2025 (at a minimum; duration to be determined in consultation with Indigenous groups and relevant authorities)	
	<p>3.18.5 if results of the monitoring referred to in conditions 3.18.1, 3.18.2, 3.18.3 or 3.18.4 or the results of the fish habitat utilization survey referred to in condition 3.18.4.2.1 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water and sediment quality, develop and implement modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation and use of an effluent treatment facility. The Proponent</p>	On or about September 2021	After December 2029 (at a minimum across the four conditions referenced, to be determined based on the length of time needed to develop and implement the modified or	

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	shall submit these measures to the Agency before implementing them.”		additional mitigation measures)	
3.19	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and Goudreau Lake from changes in groundwater quality caused by the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project in consultation with Indigenous groups. As part of the implementation of the follow-up program, the Proponent shall:	October 2020	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time needed to develop and implement the modified or additional mitigation measures)	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	3.19.1 monitor groundwater quality using as benchmarks the comparative standards for water quality identified by the Proponent in Table 7-54 of the Environmental Impact Statement; and	April 2021	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time	

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			needed to develop and implement the modified or additional mitigation measures)	
	3.19.2 if the results of the monitoring referred to in condition 3.19.1 demonstrate that modified or additional mitigation measures are required to mitigate adverse environmental effects on fish and fish habitat of changes in groundwater quality caused by the Designated Project, develop and implement modified or additional mitigation measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.”	Spring 2022	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time needed to develop and implement the modified or additional mitigation measures)	
	Migratory Birds			
4.1	“The Proponent shall carry out the Designated Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's <i>Avoidance Guidelines</i> and the risk of incidental take. The	February 2021	On or about December 2048	

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	Proponent's actions when carrying out the Designated Project shall be in compliance with the <i>Migratory Birds Convention Act, 1994</i> , the <i>Migratory Birds Regulations</i> and with the <i>Species at Risk Act</i> ."			
4.2	"The Proponent shall control lighting required during all phases of the Designated Project, including direction, timing and intensity, to avoid adverse environmental effects on migratory birds, while meeting health and safety requirements."	February 2021	On or about December 2048	
4.3	"The Proponent shall undertake, in consultation with Indigenous groups and relevant authorities, progressive reclamation of the project study area. The Proponent shall identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, plant species native to the area of the Designated Project to use for revegetation as part of the progressive reclamation, including species suitable to create habitat for migratory birds."	June 2020	On or about December 2038	
4.4	"The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area. As part of the implementation of the follow-up program, the Proponent shall:	October 2020	January 2021	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and
	4.4.1 monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the tailings management facility and the water quality control pond during all phases of the Designated Project	June 2022	December 2041	

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	until such time that water quality in the tailings management facility and the water quality control pond meet legislative requirements and water quality objectives. The water quality objectives are to be established using an ecological risk based approach, developed in consultation with Indigenous groups and relevant authorities;			implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	4.4.2 monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the open-pit lake during decommissioning. The Proponent shall determine, in consultation with indigenous groups and relevant authorities, the frequency and duration of the monitoring during decommissioning; and	On or about January 2039	On or about December 2041	
	4.4.3 if results of the monitoring referred to in conditions 4.4.1 or 4.4.2 indicate that migratory birds use the tailings management facility, the water quality control pond or the open-pit lake, develop, in consultation with Indigenous groups, and implement deterrence measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them”	On or about June 2022	December 2041	
4.5	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions	October 2020	On or about December 2045	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to

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	4.1 to 4.3. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the progressive reclamation referred to in condition 4.3. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the implementation of the follow-up program, the Proponent shall:			ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	4.5.1 conduct migratory bird surveys annually for the first three years following completion of construction to assess changes in migratory bird populations caused by the Designated Project. The Proponent shall determine the methodology for the migratory bird surveys in consultation with Indigenous groups and relevant authorities. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities and based on the results of the initial surveys, if additional surveys are required after the first three years following completion of construction and at what frequency and in which locations these additional surveys shall occur; and	On or about April 2023	On or about December 2025 (at a minimum, to be determined in consultation with Indigenous groups and relevant authorities and based on the results of the initial surveys)	
	4.5.2 monitor the effectiveness of the progressive reclamation referred to in condition 4.3, including the establishment of native plant species to create habitat for migratory birds, annually during operation and during the first three years of decommissioning and every five years thereafter. The Proponent shall monitor the effectiveness of the progressive	On or about April 2023	On or about December 2046 (at a minimum, until it has been determined, in consultation with Indigenous groups and relevant	

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	reclamation referred to in condition 4.3 until the Proponent has determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met.”		authorities, that the performance indicators have been met)	
Health of Indigenous Peoples				
5.1	“The Proponent shall develop, prior to construction, measures to mitigate emissions of dust and fugitive particulate generated by the Designated Project, including dust associated with mine vehicles on roads located within the property boundary, that take into account the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality Criteria</i> . The Proponent shall submit these measures to the Agency before implementing them. The Proponent shall implement these measures during construction, operation and the first three years of decommissioning. “	October 2020	On or about December 2041	
5.2	“The Proponent shall undertake reagent handling and ore processing activities in an enclosed space equipped with a dust collection system. “	On or about April 2023	On or about December 2038	
5.3	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of	October 2020	January 2021	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to

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	Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates, particulate matter (PM ₁₀), fine particulate matter (PM _{2.5}), sulphur dioxide, nitrogen dioxide and cadmium. As part of the follow-up program, the Proponent shall:			ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	5.3.1 identify, prior to construction, monitoring locations for air contaminants within areas used by Indigenous groups for traditional purposes for which maximum concentrations of air contaminants were predicted by the Proponent during the environmental assessment, as identified in Appendix N of the final response to Information Request 01 (Canadian Environmental Assessment Registry Reference Number 80044, Document Number 26);	January 2021	January 2021	
	5.3.2 monitor, during construction, operation and the first three years of decommissioning, air contaminants at the monitoring locations identified pursuant to condition 5.3.1, using as benchmarks the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality Criteria</i> . The Proponent shall monitor fine particulate matter (PM _{2.5}) in real-time, particulate matter (PM ₁₀) and cadmium at a minimum every 6 days and total suspended particulates, sulphur dioxide and nitrogen dioxide at a frequency that shall allow the Proponent to monitor adverse environmental effects on human health. The Proponent shall determine the frequency	August 2021	On or about December 2041	

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	of monitoring for total suspended particulates, sulphur dioxide and nitrogen dioxide in consultation with Indigenous groups and relevant authorities during the development of the follow-up program;			
	5.3.3 notify the Agency and Indigenous groups in writing within 24 hours of any exceedance(s) observed by the Proponent during monitoring referred to in condition 5.3.2 of 1-hour limits or 24-hour limits of the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality Criteria</i> , except for fine particulate matter (PM _{2.5}); and	February 2021	On or about December 2041	
	5.3.4 determine, in consultation with Indigenous groups and relevant authorities, the thresholds for concentration of fine particulate matter (PM _{2.5}) above which the Proponent shall notify Indigenous groups. “	October 2020	January 2021	
5.4	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish. As part of the follow-up program, the Proponent shall:	October 2020	January 2021	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage
	5.4.1 identify, prior to construction, fish species that shall be monitored, waterbodies where Indigenous use is expected and where contaminants shall be monitored;	October 2020	January 2021	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	5.4.2 monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during all phases of the Designated Project;	On or about February 2021	On or about December 2041 (monitoring for background and receiver monitoring locations will be re-assessed after the 10-year sampling period)	environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	5.4.3 monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during decommissioning;	On or about December 2038	On or about December 2041	
	5.4.4 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years during all phases of the Designated Project, starting the first year of construction, and every five years after the end of decommissioning. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities, if additional monitoring must be implemented after the end of decommissioning; and	October (fall) 2021	On or about December 2046 (at a minimum; additional monitoring to be determined in consultation with Indigenous groups and relevant authorities)	
	5.4.5 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years starting at the beginning of decommissioning and for a duration that	On or about January 2039	On or about December 2041 (at a minimum, duration to be determined in consultation with	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	shall be determined in consultation with Indigenous groups and relevant authorities. “		Indigenous groups and relevant authorities)	
	Current Use of Lands and Resources for Traditional Purposes			
6.1	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Designated Project and the adverse environmental effects of the Designated Project with Indigenous groups. The Proponent shall implement and maintain the communication plan up-to-date during all phases of the Designated Project. The communication plan shall include procedures, including timing and methods, for sharing information on the following:</p> <p>6.1.1 the location and timing of Designated Project activities that may affect quality of experience to Indigenous uses of lands for traditional purposes caused by changes in dust, noise or light within the property boundary and that may permanently or temporarily affect navigation within the project study area;</p> <p>6.1.2 the results of the follow-up program referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2, and 7.3, including any potential health risks, in plain language, and the modified or additional mitigation measures developed and implemented by</p>	October 2020	End of all Project phases (on or about December 2091)	Monitoring will be re-assessed following the period of Active Monitoring to determine if further action is needed as described in the <i>Closure Plan</i>

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	the Proponent pursuant to condition 2.7 for each follow-up program. “			
6.2	“The Proponent shall develop, as part of the communication plan referred to in condition in 6.1, procedures for Indigenous groups to provide feedback to the Proponent about adverse environmental effects caused by the Designated Project related to access to and use of lands for traditional purposes, and procedures for the Proponent to document and respond in a timely manner to the feedback received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project. “	October 2020	End of all Project phases (on or about December 2091)	
6.3	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a Historic Resources Management Plan for structures, sites, or things of historical, archaeological, paleontological, or architectural significance. The Proponent shall implement the plan during all phases of the Designated Project. As part of the plan, for any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the property boundary by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated project, the Proponent shall:	September 2019	End of all Project phases (on or about December 2091)	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>6.3.1 immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery;</p> <p>6.3.2 delineate an area with a radius of at least 30 metres around the discovery as a no-work zone and monitor any work conducted within 50 metres around the discovery;</p> <p>6.3.3 conduct an assessment at the location of the discovery;</p> <p>6.3.4 inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in the archeological work; and</p> <p>6.3.5 consult Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance. “</p>			
6.4	“As part of the progressive reclamation referred to in condition 4.3, the Proponent shall:	June 2020	End of all Project phases (on or about December 2091)	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>6.4.1 identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, species of interest to Indigenous peoples to use for revegetation as part of the progressive reclamation; and</p> <p>6.4.2 develop, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, measures to manage the spread of invasive species. The Proponent shall submit these measures to the Agency before implementing them.”</p>			
6.5	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>). As part of the development of the follow-up program, the Proponent shall identify, in consultation with Indigenous groups and relevant authorities, species of mammals, in addition to black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>), that shall be monitored. If the results of the monitoring indicate that these mammal</p>	October 2020	End of all Project phases	<p>Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the</p>

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	species use the property, the Proponent shall implement modified or additional mitigation measures pursuant to condition 2.7 to prevent the identified species of mammals from accessing Designated Project components.”			accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
6.6	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures, including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project.”	October 2020	End of all Project phases (on or about December 2091)	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	Wetlands			
7.1	“The Proponent shall restore a minimum of 40 hectares of wetland within the property boundary. The	To be confirmed (toward the end	December 2041	As restoration of the wetland area will be done

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	Proponent shall determine, in consultation with Environment and Climate Change Canada, methods for restoration that are technically and economically feasible and that are appropriate for the project study area.”	of the operations phase)		as part of the reclamation of the Tailings Management Facility at closure, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.
7.2	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of restoration referred to in condition 7.1. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the restoration. The Proponent shall monitor the effectiveness of the restoration from the start of the restoration until performance indicators are met.”	October 2020	December 2045	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
7.3	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of snapping turtle (<i>Chelydra serpentina</i>) or snapping turtle eggs within the project study area. The Proponent shall implement the follow-up program during construction and operation. If the Proponent observes snapping turtle or snapping turtle eggs, the Proponent shall develop, in consultation with Indigenous groups and relevant authorities, modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation of exclusion fences around snapping turtle habitat, if technically feasible, or the relocation of snapping turtles outside of the project study area. The Proponent shall submit these measures to the Agency before implementing them.”</p>	October 2020	On or about December 2038	<p>Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.</p>
Accidents and Malfunctions				
8.1	<p>“The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.”</p>	February 2021	End of all Project phases (on or about December 2091)	
8.2	<p>“The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.”</p>	October 2020	On or before January 2021	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
8.3	<p>“The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an accident and malfunction response plan in relation to the Designated Project. The accident and malfunction plan shall include:</p> <p>8.3.1 the types of accidents and malfunctions that may cause adverse environmental effects;</p> <p>8.3.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 8.3.1 to mitigate any adverse environmental effect(s) caused by the accident or malfunction; and</p> <p>8.3.3 the role of Indigenous groups in the implementation of the accident and malfunction plan.”</p>	October 2020	January 2021	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation.
8.4	<p>“In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall immediately implement the measures appropriate to the accident or malfunction as described in the accident and malfunction response plan referred to in condition 8.3.2 and shall:</p> <p>8.4.1 notify, as soon as possible, Indigenous groups and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. For the notification to Indigenous groups and the Agency, the Proponent shall specify:</p>	February 2021 (to be implemented as required)	End of all Project phases (on or about December 2091)	This EA condition will be implemented if/when accidents or malfunctions occur.

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>8.4.1.1 the date the accident or malfunction occurred;</p> <p>8.4.1.2 a description of the accident or malfunction;</p> <p>8.4.1.3 a list of any substances potentially released in the environment as a result of the accident or malfunction.</p> <p>8.4.2 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:</p> <p>8.4.2.1 a detailed description of the accident or malfunction and of its adverse environmental effects and any associated potential health risks;</p> <p>8.4.2.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;</p> <p>8.4.2.3 any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects, the associated potential health risks and the measures taken by the Proponent to mitigate these adverse environmental effects;</p>			

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>8.4.2.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and</p> <p>8.4.2.5 details concerning the implementation of the accident or malfunction response plan referred to in condition 8.3</p> <p>8.4.3 submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 8.4.2. The report shall include all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 9.4.2.3 were received by the Proponent.” [It is understood that the reference to 9.4.2.3 should be 8.4.2.3; this is an error in the original Decision Statement. There is no condition 9.4.2.3.]</p>			
8.5	“The Proponent shall develop a communication plan in consultation with Indigenous groups. The Proponent shall develop the communication plan prior to	October 2020	January 2021	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:</p> <p>8.5.1 the types of accident and malfunction requiring the Proponent to notify the respective Indigenous groups;</p> <p>8.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups to assist in the response to the accident or malfunction; and</p> <p>8.5.3 the contact information of the representatives of the Proponent that the Indigenous groups may contact and of the representatives of the respective Indigenous groups to which the Proponent provides notification.”</p>			
Schedules				
9.1	“The Proponent shall submit to the Agency a schedule for all conditions set out in this Decision Statement no later than 60 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.”	October 2020	October 2020	The initial version of this schedule was submitted in October 2020. This document is the annual update.
9.2	“The Proponent shall submit to the Agency a schedule outlining all activities required to carry out all phases of the Designated Project no later than 60 days prior to	October 2020	October 2020	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.”			
9.3	“The Proponent shall submit to the Agency in writing an update to schedules referred to in conditions 9.1 and 9.2 every year no later than March 31, until completion of all activities referred to in each schedule.”	March 2021	On or about December 2048	An initial version of the two schedules was submitted in October 2020. An update was provided in the 2020 Annual Report (March 2021). This document is a further update of the Schedule of EA conditions (EA condition 9.1). Subsequent versions of both schedules will continue to be incorporated into the annual reports.
9.4	“The Proponent shall provide to the Agency revised schedules if any change is made to the initial schedules referred to in conditions 9.1 and 9.2 or to any subsequent update(s) referred to in condition 9.3, upon revision of the schedules.”	As required	On or about December 2048	
9.5	“The Proponent shall provide Indigenous groups with the schedules referred to in conditions 9.1 and 9.2 and the updates or revisions to the initial schedules pursuant to condition 9.3 and 9.4 at the same time the Proponent provides these documents to the Agency.”	October 2020	On or about December 2048	

Magino Gold Project EA Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	Record Keeping			
10.1	“The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.”	January 2019	On or about December 2063	
10.2	“The Proponent shall retain all records referred to in condition 10.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.”	January 2019	On or about December 2063	
10.3	“The Proponent shall notify the Agency of any change to the contact information of the Proponent included in this Decision Statement.”	As required	End of all Project phases (on or about December 2091)	

APPENDIX C: SCHEDULE OF ALL ACTIVITIES (EA CONDITION 9.2)

See also *Table 1: Schedule of Key Project Milestones* in Appendix B for additional reference information.

Table 3: Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2

Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2					
#	Activity Description	Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration (Months /Years)	Relevant Notes
Construction (2 years – February 2021 – March 2023)					
1	Clearing, grubbing and site grading required for the construction of the following project components:	February 2021	May 2022	15 months	No clearing during May 15 – August 31.
2	the open pit;	February 2021	July 2021	7 months	
3	the tailings and mine rock management facilities and associated water management systems;	February 2021	October 2022	2 years	
4	the ore stockpile areas;	February 2021	May 2021	4 months	
5	processing plant area, including the ore stockpile, conveyor and all associated infrastructure, including reagent storage area and truck shop;	February 2021	May 2021	4 months	
6	the explosives storage area; and	February 2021	August 2022	18 months	
7	worker accommodation area.	February 2021	May 2021	4 months	
8	Building the public bypass road would be built with aggregate and overburden sourced from on-site material, and with side ditches and culverts at creek crossings. The public bypass road would be built to the grade of a primary forest road in accordance with Ontario Ministry of Natural Resources and Forestry guidance, and be subject to provincial approval under the <i>Provincial Lands Act</i> .	April 2021	March 2023	2 years	There will be a temporary by-pass road in place while the permanent one is in construction
9	Constructing of a drainage channel north of Water Body 10 to enhance flow and drainage.	April 2021	November 2022	~2 years	

Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2					
Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration (Months /Years)	Relevant Notes
#	Description				
10	Constructing of a channel to connect the outflow of Spring Lake to the lower reach of McVeigh Creek, south of the bypass road.	April 2021	November 2022	~2 years	
11	Decommissioning historical mine components (buildings, non-mine waste landfill, existing tailings management facility).	February 2021	March 2023	2 years	Building decommissioning will be initiated during construction,
12	Draining waterbodies to be overprinted by the project footprint, including Lovell Lake, Webb Lake, part of McVeigh Creek and tributaries, waterbodies 1, 2, 3, 4, 5 and 10.	September 2021	March 2023	~2 years	
Operation (15 years –April 2023 to December 2038)					
13	Extracting ore from the open pit (this would occur over an estimated 17-year period).	April 2023	December 2038	16 years	Includes pre-stripping (during construction phase)
14	Drilling and blasting zones of rock.	April 2021	December 2038	18 years	
15	Removing the material and hauling it in trucks to the processing plant, stockpile areas and mine rock management facility.	March 2021	March 2040	19 years	
16	Dewatering the open pit.	May 2021	December 2038	17 Years	
17	Stockpiling of overburden, low-grade ore and waste rock.	April 2021	December 2038	17 Years	
18	Storing and using of explosives.	March 2021	December 2038	17 Years	
19	Processing ore: Raw ore material extracted from the open pit or transferred from the ore stockpile will be processed through a crusher and a grinding circuit. A	April 2023	March 2040	17 Years	

Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2					
Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration (Months /Years)	Relevant Notes
#	Description				
	leaching and refining process would finely grind the ore and extract gold using cyanide and other reagents. Smelting to produce gold doré would then occur following the use of an electro- winning circuit.				
20	Water-taking from Goudreau Lake to supply potable and process water.	June 2022	March 2040	18 Years	
21	Managing mine water (effluent, runoff and seepage) and sewage.	March 2021	March 2040	19 years	
22	Operating roads including mine haul and service roads, potable and process water infrastructure, sewage treatment system, on-site back-up power system, and accommodation facilities.	March 2021	March 2040	19 years	
23	Rehabilitating the site progressively.	April 2023	June 2040	17 Years	
	Decommissioning (i.e., Active Closure, 3 years January 2039 to December 2041)				
24	Removing project components that support ore extraction, processing and transport.	February 2038	December 2041	4 years	
25	Draining of tailings water to the open pit.	January 2041	December 2083	43 years	
26	Removing of discharge and piping systems in the tailings management facility.	January 2039	December 2041	3 years	
27	Grading of surfaces and placement of overburden and soil on portions of the tailings and mine rock management facilities, followed by selective seeding to initiate revegetation.	May 2039	October 2041	2 years	
28	Constructing wildlife access ramps on the tailings and mine rock management facilities.	May 2039	December 2041	2 years	
29	Revegetating the project footprint.	May 2039	October 2041	2 years	

Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2					
Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration (Months /Years)	Relevant Notes
#	Description				
	Abandonment (50 years, including 7 years of Active Monitoring (in addition to Active Monitoring undertaken during Decommissioning) followed by Passive Abandonment January 2042 to December 2091)				
30	Monitoring of environmental conditions (e.g. water quality in water quality control pond, seepage collection ponds and open pit) to determine when direct release to the surrounding environment would be acceptable.	April 2023	December 2083	61 years	These are expected to occur continually throughout operations and pit flooding
31	Monitoring of success of site rehabilitation plan.	May 2036 [SEE #23]	December 2080 [for monitoring of pit filling]	45 years	Same – some monitoring of progressive reclamation through operations as well
32	Maintaining of the water quality control pond to receive drainage from the tailings and mine rock management facilities in perpetuity.	April 2023	December 2041	19 years	To be maintained throughout operations and closure
33	Filling the open pit through natural runoff and groundwater flows. Natural filling would be supplemented with pumped water from Goudreau Lake at the same rate as freshwater taking during operations (1680 cubic metres per day). This would take approximately 43 years.	Jan 2037	Dec 2080	44 years	
34	Connecting of the open pit lake with Goudreau Lake, upon demonstration that open pit lake water quality monitoring is suitable for discharge.	June 2080	June 2081	1 year	